

**From:** [Gaudreau, Eric](#)  
**To:** [lighting@energystar.gov](mailto:lighting@energystar.gov)  
**Cc:** [Vyas, Shivani](#); [Lockner, Jeffrey](#)  
**Subject:** ENERGY STAR Recessed Downlights V1.0 First Draft Comments  
**Date:** Friday, April 21, 2023 4:33:01 PM  
**Attachments:** [image001.png](#)

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Ms. Taylor Jantz-Sell  
Manager Lighting Program  
ENERGY STAR  
U.S. Environmental Protection Agency  
Washington, DC 2046

Dear Ms. Jantz-Sell:

Thank you for the opportunity to comment on the Recessed Downlights V1.0 first draft comments and we appreciate your consideration, our comments and points of clarification are as follows:

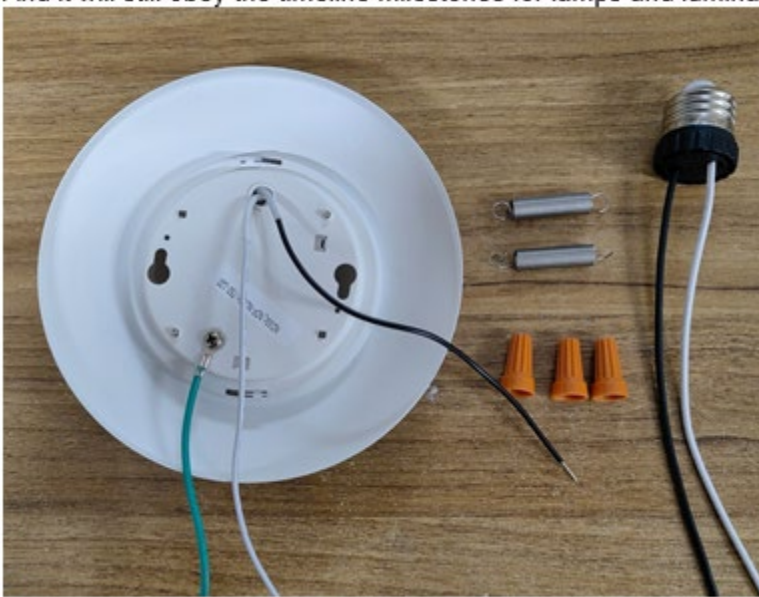
Regarding 9.1 Lumen Maintenance and 9.3 Color Maintenance, the LM-80-21 standard is relatively new and may not yet be widely adopted by manufacturers and laboratories. Currently, many laboratories have not upgraded their LM-80 capabilities to the 2021 version, and many LM80 reports we see today being used for certification are to the old LM-80 test method. Considering LM-80 testing is a long-term procedure that cannot be completed within a short timeframe, it may be difficult for manufacturers or laboratories to upgrade their testing and complete the testing within a condensed period. Therefore, we kindly request that LM-80-15 be included as an acceptable option in the requirements. This will provide manufacturers and laboratories with greater flexibility in their testing, particularly in cases where the latest version of LM-80 may not be available or feasible to implement. We appreciate your consideration in this matter.

Regarding ANSI/UL 1598:2008, this is an outdated version of the standard. As such, it is recommended that the standard be updated to the more recent ANSI/UL 1598:2021 version. While certain sections of this requirement have been revised to the 2021 version, sections 8.3, 9.1, and 12.1 have not yet been updated.

Regarding this note: EPA aims to complete this process promptly and release a final Recessed Downlight V1.0 specification in 2023. After its release date, until the end of 2023, partners will be able to certify new models to either Luminaires V2.2 or Recessed Downlights V1.0. Consistent with the Luminaires V2.2 sunset timeline, after December 31, 2023, new recessed downlight and recessed downlight retrofit kit models must be certified to Recessed Downlights V1.0. Additionally, upon finalization of Recessed Downlights V1.0, EPA's intent is that currently certified models that meet the new requirements may be certified to the new specification without additional testing.

Comment: Most currently certified models were tested to LM-79-08, this does not seem to meet the proposed requirement that testing be conducted per LM-79-19 . Would certification be allowed from this old LM-79-08 data?

Scope/ Eligibility question: Are products that are sold and marketed as both a surface mounted downlight and a downlight retrofit kit eligible for certification? See example below for a retrofit product intended for surface mount or recessed downlight installations.



Regarding the driver case temperature measurement requirement: We have seen an increase in fully integrated drivers as well as ‘drivers on board’ over the past several years during the evaluation. These types of products often do not have cases, or case temperature identified as in traditional drivers. Additionally, these components and temperature measurements are evaluated during the safety certification process. We do not see additional value in keeping this measurement as part of the Energy Star evaluation and would recommend it be removed.

Best Regards,

**Eric M. Gaudreau**

Lighting Industry Technical Advisor

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