



National Association of State Energy Officials

October 8, 2021

Honorable Jennifer Granholm
Secretary
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585
Via 2021STD0012GSLDefinitions@ee.doe.gov

Subject: EERE-2021-BT-STD-0012, Definitions for General Service Lamps

Dear Secretary Granholm:

The National Association of State Energy Officials (NASEO)—representing the governor-designated State Energy Offices of the 56 states, territories, and District of Columbia— appreciates the opportunity to comment on this important docket concerning the Department of Energy’s proposed rule that would amend the definition of “general service lamp” to include many of the most common types of light bulbs used in homes and businesses. Expanding this definition will ensure that new energy efficiency standards that are required by law apply to nearly all light bulbs sold, delivering very large bill savings for consumers and climate emissions reductions. We urge you to act promptly to finalize the broadened definition and swiftly apply improved standards.

A two-step process

In May 2021, DOE sought initial input on potentially implementing the backstop standards contained in the Energy Independence and Security Act of 2007. Congress set a backstop standard by law to make sure that an improved requirement would take effect. But, under the last administration, DOE first reversed a 2017 rule that had expanded the definition of general service lamp and then determined that the backstop standard did not apply.

By ensuring that new standards would apply not only to classic pear-shaped light bulbs but also to other common shapes such as reflector, candelabra, and globe shapes, the proposed new definition would dramatically expand the benefits of new light bulb standards. Thus, we support the two-step process that DOE has begun: first, expand the definition of “general service lamp” to include all common types of bulbs and, second, implement the backstop standard.

Big consumer savings and emissions reduction at stake

Changing just one bulb from an incandescent bulb to an LED saves \$40 - \$90 over ten years.1 Using the midpoint of this estimate (\$65) and the average number of bulbs per US home (about 45), that translates into \$3,000 in net savings over 10 years. It’s no wonder that LED

1 See “LEDs: A great deal for consumers” in “US Light Bulb Standards Save Billions for Consumers But Manufacturers Seek a Rollback.” Appliance Standards Awareness Project and American Council for an Energy-Efficient Economy, July 2018.

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bulbs have become very popular—gaining about 60% market share² due to their low-cost, long lifetime, energy and bill savings, and ability to light up just like the inefficient incandescent bulbs they replace. Also, according to the Appliance Standards Awareness Project, updated GSL standards could avoid an annual 2.7 to 6.2 million metric tons (MMT) of carbon dioxide (CO₂) in 2030 with concomitant utility bill savings (\$2.6 billion in 2035).³

But many manufacturers and retailers continue to promote incandescent bulbs that burn out frequently, waste money, and harm the environment. Many consumers stick with familiar products out of habit even though high-quality, low-cost alternatives are available. Others, especially lower income populations, lack easy access to retailers that sell affordable LEDs. Implementing the improved standards would ensure all consumers benefit from modern light bulb technology.

Executive Order 13990, “Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis,”⁴ issued by President Biden on Inauguration Day, directs agencies to review actions of the previous administration that conflict with his policies. In February, DOE identified the light bulb rules for review.⁵ The Executive Order directs DOE to complete work on these and other reviews by December 31, 2021.

We urge DOE to finalize the revised definition and adopt the backstop standard as soon as possible, but no later than December 31, 2021.

Thank you for considering this input.

Best regards,



David Terry
Executive Director, NASEO

cc:
State Energy Offices
Gina McCarthy, National Climate Advisor
Kathleen Hogan, Acting Undersecretary for Science and Climate, U.S. DOE
Kelly Speakes-Backman, Acting Assistant Secretary and Principal Deputy Secretary for Energy Efficiency and Renewable Energy, U.S. Department of Energy
David Nemetzow, Building Technologies Office Director, Office of Energy Efficiency and Renewable Energy, U.S. Department of Energy

² See <https://www.creedlighttracker.com/>

³ J. Mauer and A. deLaski (2020), A Powerful Priority: How Appliance Standards Can Help Meet U.S. Climate Goals and Save Consumers Money,” Appliance Standards Awareness Project and American Council for an Energy-Efficient Economy, https://appliance-standards.org/sites/default/files/Powerful_Priority_Report.pdf. The higher CO₂ avoidance figure is based on the U.S. Energy Information Administration’s reference case for grid generation; the lower figure is based a low carbon generation scenario.

⁴ 86 Federal Register 7037

⁵ “Review of Actions of the Prior Administration.” Memorandum from Kelly Speakes-Backman, Acting Assistant Secretary for Energy Efficiency and Renewable Energy. Feb. 19, 2021. https://www.energy.gov/sites/prod/files/2021/02/f82/eere_eo13990_memo_1.pdf