

May 27, 2009

Honorable Steven Chu  
Secretary  
U.S. Department of Energy  
1000 Independence Ave., SW  
Washington, DC 20585

**RE:** Re: Fluorescent Tube and Incandescent Reflector Lamps Rulemaking  
Docket #: EE-2006-STD-0131

Dear Secretary Chu,

We are writing to urge you to substantially strengthen the proposed new national energy efficiency standards for fluorescent tube and incandescent reflector light bulbs. Signers to this letter include leading national, regional and state energy efficiency organizations, consumer advocacy and environmental organizations, as well as state government agencies, utility regulators, businesses and utilities. Strong new efficiency standards for these common lighting products have the potential to save more energy than any other appliance standard ever established by the Department of Energy (DOE).

These standards will cover linear fluorescent tube lamps, such as those which light most offices, and incandescent reflector lamps, such as those typically used in recessed, ceiling light fixtures found in homes and businesses. According to DOE's proposed rule, the highest cost-effective standards for these products would, over thirty years:

- Save up to 1.6 trillion kilowatt hours – enough electricity to meet the total needs of 142 million households for a year.
- Net businesses and consumers up to \$70 billion in savings.
- Reduce CO2 emissions up to 800 million tons between 2012 and 2042. If we assume a value of \$17/ton avoided, these emission savings would add over \$13 billion in economic benefits from this standard, on top of the direct savings gained by lighting consumers.
- Create as many as 43,000 jobs by 2022. These jobs are indirectly created as energy bill savings are spent on other goods and services or invested.

These savings are monumental. Unfortunately, DOE's proposed standards, developed under the previous administration, capture only half of the potential savings.

We are pleased that, under your leadership, DOE recently reversed a legal determination, thus enabling DOE to close a gaping loophole in the standard for reflector lamps. About one-third of current sales would have been exempted. Closing this loophole is an excellent first step towards making the estimated savings real. We urge you to complete

the follow-on rulemaking to cover these previously exempted lamps by the end of this year.

In the current rulemaking, general service fluorescent lamps present the largest savings opportunity. We urge you to substantially strengthen the proposed standard. Increasing the energy efficiency of the hundreds of millions of tubular lamps sold every year is one of the biggest single steps you can take to capture increased energy and dollar savings. There are also significant energy savings possible through a strengthened incandescent reflector lamp standard. Further improvements appear cost effective based on DOE analysis and we ask that you reconsider this proposal as well.

In March of this year, you indicated that appliance standards were not aggressive enough. You can change that by making a break with the past and setting a lamp standard that truly achieves “the maximum improvement in energy efficiency that is technologically feasible and economically justified,” as Congress directed.

Strong standards help meet the nation’s energy needs, combat global warming, and save consumers money. As the first major appliance standards rule of the Obama administration, getting these lighting standards right is also symbolically important. Strong lighting standards will demonstrate the commitment to improved energy efficiency that you and the President have spoken of regularly. We look forward to the adoption of many strong new standards during your tenure as Energy Secretary.

Thank you for considering this request.

Sincerely,



Steven M. Nadel, Executive Director  
American Council for an Energy-Efficient Economy



David B. Goldstein, Co-Director, Energy Program  
National Resources Defense Council



David Terry, Executive Director  
National Association of State Energy Officers



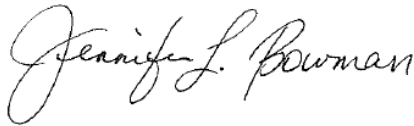
Karen Douglas, Chairman  
California Energy Commission



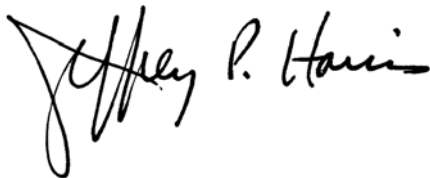
Mel Hall-Crawford, Energy Projects Director  
Consumer Federation of America



Duane J. Larson, Director, Customer Energy Efficiency  
Pacific Gas and Electric Company



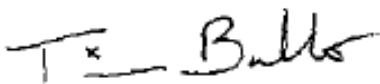
Jennifer L. Bowman, Program Director, Energy and Climate Change  
The Dow Chemical Company



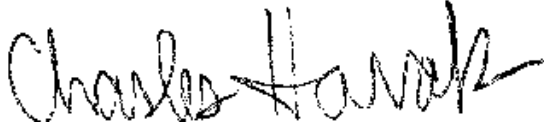
Jeffrey P. Harris, Vice President, Programs  
Alliance to Save Energy



Andrew L. deLaski, Executive Director  
Appliance Standards Awareness Project



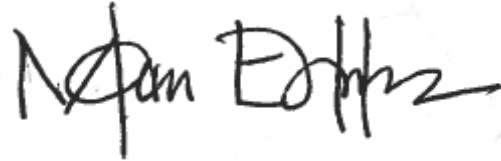
Timothy D. Ballo, Associate Attorney  
Earthjustice



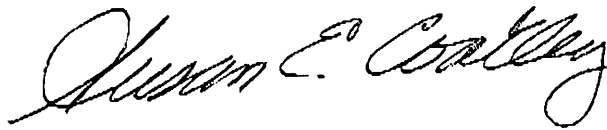
Charles Harak, Esq.  
National Consumer Law Foundation on behalf of its low-income clients



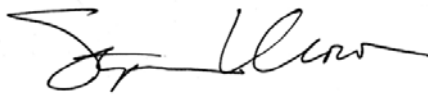
Dian M. Grueneich, Commissioner  
California Public Utilities Commission



Mark S. Eggers, Program Manager, Codes and Standards  
Energy Efficiency Services  
New York State Energy Research and Development Authority



Susan E. Coakley, Executive Director  
Northeast Energy Efficiency Partnerships



Stephen L. Crow, Executive Director  
Northwest Power and Conservation Council



Roya Stanley, Director  
Iowa Office of Energy Independence



Richard E. Morgan, Commissioner (individually)  
District of Columbia Public Service Commission



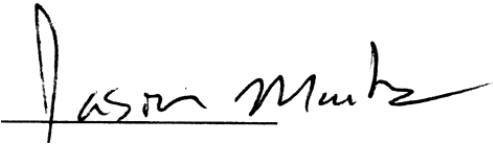
Carlito P. Caliboso, Chairman  
Hawaii Public Utilities Commission



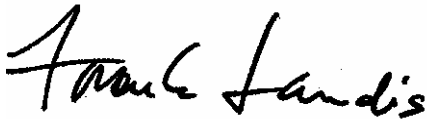
Kevin D. Gunn, Commissioner  
Missouri Public Service Commission



Clifton Below, Commissioner  
NH Public Utilities Commission



Jason Marks, Commissioner  
New Mexico Public Regulation Commission



Frank E. Landis, Chairman  
Nebraska Public Service Commission



Anne Boyle, Commissioner  
Nebraska Public Service Commission



Rebecca Wagner, Commissioner  
Public Utilities Commission of Nevada



John F. Savage, Commissioner  
Public Utility Commission of Oregon



Patrick J. Oshie, Commissioner  
Washington Utilities and Transportation Commission



Thomas R. Rochon, President  
Ithaca College



Kenneth R. Garren, Ph.D., President  
Lynchburg College



David S. Hamilton, Director of Global Warming and Energy Programs  
Sierra Club



Seth Kaplan, Vice President for Climate Advocacy  
Conservation Law Foundation



Robert M. Sargent, Energy Program Director  
Environment America

HOWARD LEARNER

Howard Learner, Executive Director  
Environmental Law & Policy Center.



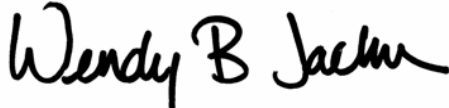
Daniel L. Sosland, Executive Director  
Environment Northeast



Carol Werner, Executive Director  
Environmental and Energy Study Institute



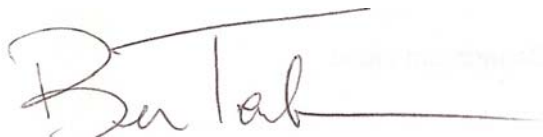
Alisa Gravitz, Executive Director  
Green America



Wendy B. Jaehn, Executive Director  
Midwest Energy Efficiency Alliance



David C. Hewitt, Executive Director  
New Buildings Institute



Ben Taube, Executive Director  
Southeast Energy Efficiency Alliance



John D. Wilson, Research Director  
Southern Alliance for Clean Energy



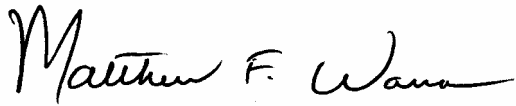
Howard Geller, Executive Director  
Southwest Energy Efficiency Project



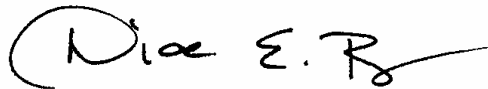
Susan Stephenson, Executive Director  
The Regeneration Project, Interfaith Power and Light



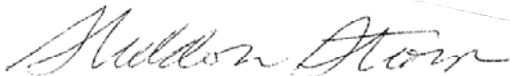
Russell Unger, Executive Director  
Urban Green Council (U.S. Green Building Council of New York)



Matthew F. Wasson, Director of Programs  
Appalachian Voices



Diane E. Brown, Executive Director  
Arizona PIRG



Sheldon Strom, President  
Center for Energy and Environment



Charlie Higley, Executive Director  
Citizen's Utility Board of Wisconsin

*Terrence G. Kardong*

Terrence G. Kardong, Chair, Clean Electricity Task Force  
Dakota Resource Council

*Luke Metzger*

Luke Metzger, Director  
Environment Texas

*Constance Brookes*

Constance Brookes, Executive Director  
Friends Fiduciary Corporation

*Marian Riggs Gelb*

Marian Riggs Gelb, Executive Director  
Iowa Environmental Council

*Janine L. Migden-Ostrander*

Janine L. Migden-Ostrander, Consumers' Counsel  
Office of the Ohio Consumers' Counsel

*Ann L. Hartstein*

Ann L. Hartstein, Executive Director  
Massachusetts Association of Older Americans

*Chris Kolb*

Chris Kolb, President  
Michigan Environmental Council

Kathleen Hadley, Executive Director  
National Center for Appropriate Technology

Sara Patton, Director  
NW Energy Coalition

Montelle Clark, Director  
Oklahoma Sustainability Network

Carol Biedrzycki, Executive Director  
Texas Ratepayers' Organization to Save Energy

*The following signed on but were not able to provide a signature:*

Marchant Wentworth, Washington Representative  
Union of Concerned Scientists

Grant Smith, Executive Director  
Citizen's Action Coalition of Indiana

Brian Ganrahan, Staff Attorney  
Environment Illinois

cc: Carol Browner, Assistant to the President for Energy and Climate Change