



June 10, 2016

**VIA ELECTRONIC MAIL**

The Honorable Ed Whitfield  
Chairman  
Subcommittee on Energy and Power  
House Committee on Energy and Commerce  
2125 Rayburn House Office Building  
Washington, DC 20515

The Honorable Bobby Rush  
Ranking Member  
Subcommittee on Energy and Power  
House Committee on Energy and Commerce  
2322A Rayburn House Office Building  
Washington, DC 20515

**RE: House Energy and Commerce Subcommittee on Energy and Power Hearing:  
“Home Appliance Energy Efficiency Standards Under the Department of  
Energy – Stakeholder Perspectives”**

Dear Chairman Whitfield and Ranking Member Rush:

Thank you for holding the June 10, 2016, hearing on the Department of Energy’s (DOE) energy efficiency standards for home appliances. We appreciate the Committee’s attention to this important matter.

Philips Lighting is a global leader in lighting products, systems and services. Our understanding of how lighting positively affects people coupled with our deep technological know-how enable us to deliver digital lighting innovations that unlock new business value, deliver rich user experiences and help to improve lives. Serving professional and consumer markets, we sell more energy efficient LED lighting than any other company. We lead the industry in connected lighting systems and services, leveraging the Internet of Things to take light beyond illumination and transform homes, buildings and urban spaces. In 2015, we had global sales of over 8 billion USD and currently we have approximately 36,000 employees in over 70 countries. Our North American headquarters is located in Somerset, New Jersey.

As you are aware, DOE’s appliance efficiency standards were born out of the Energy Policy and Conservation Act (EPCA), which was signed into law in 1975. Originally, DOE was to prescribe energy efficiency standards for 13 product classes. Over the years, the list of covered products has grown more than four-fold and now covers almost 60 products. Further, many of these products have been subject to two (or more) energy efficiency standards. While the Department’s appliance standards have resulted in increased energy efficiency levels for covered products, each round of updated standards produces diminished returns for consumers and manufacturers--each updated standard results in smaller improvements in energy efficiency and comes at a much greater cost for product manufacturers.



While Philips Lighting fully supports the objectives of the EPCA and DOE with respect to increased energy efficiency, we believe it is time to improve the EPCA appliance standard regime. The EPCA framework, developed decades ago, is ill-suited for fast-paced advances in modern technology and the reality of an increasingly efficiency-driven consumer market.


The EPCA, for example, requires DOE to review and update, if it deems warranted, energy efficiency standards for covered product classes at least every six years. Although standard updates are not required every six years (i.e., the Secretary may determine that a standard need not be amended), DOE faces pressure from several stakeholder groups to *act* every six years. While this timeframe for repeated rulemakings/updates may seem logical on paper, mature technologies – including many in the lighting industry – are unable to produce sustained energy efficiency increases without undue costs for marginal upgrades in efficiency. In addition, the six-year timeframe does not grant DOE sufficient time to evaluate the overall effectiveness of its latest efficiency standard before beginning the next rulemaking process. Repeated rulemakings also divert manufacturing engineering resources from accelerating the introduction of new technologies that are often more energy efficient than the technologies in an updated rulemaking.

The EPCA also restricts the Department's ability to make commonsense, consensus-driven changes to energy efficiency standards, test procedures, and product class definitions without Congressional action. This leads to an overly-rigid regulatory structure that is unresponsive to changes in products (including the development of brand new products) and consumer/market demands. Ultimately, these challenges lead to higher costs for product manufacturers and higher prices for American consumers.

In sum, the EPCA structure has shortcomings that can and should be addressed by Congress. Common-sense reforms could reduce costs for manufacturers and consumers without jeopardizing gains in energy efficiency.

Again, Philips Lighting appreciates this Committee's attention to these important issues, and we look forward to working with you as reform measures develop and progress.

Sincerely,

A large black rectangular redaction box covering the signature of Dr. David Woodward.

Dr. David Woodward  
Standards and Regulations Manager Americas  
Philips Lighting

Tel: (662) 620-6754  
e-mail: david.r.woodward@philips.com

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Stakeholder Perspectives”**

Dear Chairman Whitfield and Ranking Member Rush:

Thank you for scheduling this hearing on the Department of Energy’s (DOE) energy efficiency standards for home appliances. We appreciate the Committee’s attention to this important matter.

Acuity Brands, Inc. is one of the leading manufacturers of lighting and controls equipment in the world. We are a U.S. corporation based in Georgia with offices, manufacturing facilities, and training centers across the United States. We employ over 7,000 associates, and our fiscal year 2015 net sales totaled over \$2.7 billion. As one of the top providers of lighting solutions for both indoor and outdoor applications, we continue to innovate and expand our offerings to meet the needs and demands of our customers who desire energy-efficient products.

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In sum, the EPCA structure has shortcomings that can and should be addressed by Congress. Common-sense reforms could reduce costs for manufacturers and consumers without jeopardizing gains in energy efficiency.

Again, Acuity Brands appreciates this Committee's attention to these important issues, and we look forward to working with you as reform measures develop and progress.

Sincerely,

A black rectangular redaction box covering the signature of Cheryl English.

Cheryl English  
VP, Government & Industry Solutions  
Acuity Brands  
Cheryl.English@AcuityBrands.com  
770-860-2660

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Dear Chairman Whitfield and Ranking Member Rush:

Thank you for holding the June 10, 2016, hearing on the Department of Energy’s (DOE) energy efficiency standards for home appliances. We appreciate the Committee’s attention to this important matter.

Universal Lighting Technologies is a member of the Panasonic Group and represent their lighting distribution arm in the United States. We have over 2,000 points of distribution, 3 engineering facilities, and our corporate office in Nashville TN.

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Again, Universal Lighting Technologies appreciates this Committee’s attention to these important issues, and we look forward to working with you as reform measures develop and progress.

Sincerely,



Vice President of Marketing  
Universal Lighting Technologies

DR. S. PEKKA HAKKARAINEN, MA, PhD  
Vice President

9 June 2016

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Dear Chairman Whitfield and Ranking Member Rush:

Thank you for holding the June 10, 2016, hearing on the Department of Energy’s (DOE) energy efficiency standards for home appliances. Lutron appreciates the Committee’s attention to this important matter.

Lutron was founded in 1961 and is a manufacturer of lighting control systems and motorized window shade systems, headquartered in Coopersburg PA. Lutron has factories in Albertis PA, Allentown PA, Ashland VA, Humacao PR and four locations outside the United States.

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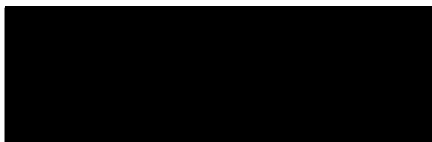
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Again, Lutron appreciates this Committee's attention to these important issues, and we look forward to working with you as reform measures develop and progress.

Sincerely,



Pekka Hakkarainen, PhD  
VP Government and Industry Relations  
Lutron Electronics Co., Inc.





Appleton Grp LLC  
9377 W. Higgins Road  
Rosemont, IL USA 60018

1 (847) 268-6000

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Dear Chairman Whitfield and Ranking Member Rush:

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Appleton Group is a business unit of Emerson Electric, based in Rosemont Illinois with manufacturing of dry type distribution transformers taking place at our factory in Rainsville Alabama under the Hevi-Duty brand name.

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Again, Appleton Group appreciates this Committee's attention to these important issues, and we look forward to working with you as reform measures develop and progress.

Sincerely,

Michael Johnson  
Vice President Product Marketing  
Mike.johnson@emerson.com  
847-268-6337

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Dear Chairman Whitfield and Ranking Member Rush:

Thank you for holding the June 10, 2016, hearing on the Department of Energy’s (DOE) energy efficiency standards for home appliances. We appreciate the Committee’s attention to this important matter.

I am the Executive Chairman of Energy Focus, Inc. which is headquartered in Solon, Ohio. Energy Focus, Inc. is a leading provider of energy efficient LED lighting products, and a developer of energy efficient lighting technology. Energy Focus’ LED tubes are ideal for retrofitting existing commercial fluorescent fixtures and can reduce lighting electricity costs by up to 75 percent.

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While Energy Focus, Inc. fully supports the objectives of the EPCA and DOE with respect to increased energy efficiency, we believe it is time to improve the EPCA appliance standard regime. The EPCA framework, developed decades ago, is ill-suited for fast-paced advances in modern technology and the reality of an increasingly efficiency-driven consumer market.

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Again, Energy Focus Inc. appreciates this Committee's attention to these important issues, and we look forward to working with you as reform measures develop and progress.

Sincerely,

A solid black rectangular box used to redact the signature of James Tu.

James Tu  
Executive Chairman  
Energy Focus, Inc.



Building Control Systems  
1061 South 800 East  
Orem, UT 84097  
801.225.280  
[www.legrand.us/wattstopper](http://www.legrand.us/wattstopper)

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Legrand is a global manufacturer of electrical and digital building infrastructure with reported sales of \$5.3 billion in 2015. Legrand has a strong presence in North America, with several thousand employees and well-known product lines that include C2G, Cablofil, Electrorack, Middle Atlantic, NuVo, On-Q, Ortronics, Pass & Seymour, Quiktron, Vantage, Watt Stopper and Wiremold.

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Again, Legrand appreciates this Committee's attention to these important issues, and we look forward to working with you as reform measures develop and progress.

Sincerely,

A large black rectangular redaction box covering the signature of Harold Jepsen.

Harold Jepsen P.E  
VP Standards & Industry Affairs  
BUILDING CONTROL SYSTEMS

Legrand, North America