

October 18, 2021

The Honorable Jennifer Granholm
Secretary
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

Re: Consumer Support for Adoption of Revised Definitions of General Service Lamp and General Service Incandescent Lamp — In Relation to DOE Proposed Rulemaking: EERE-2021-BT-STD-0012

Dear Secretary Granholm:

Consumer Federation of America (CFA), the National Consumer Law Center (NCLC), and the 9 consumer groups listed below are writing in response to the Department's [Notice of Proposed Rulemaking](#) regarding the definitions of General Service Lamp (GSL) and General Service Incandescent Lamp (GSIL) and the associated supplemental definitions (Fed. Reg.: Vol. 86, No. 158, 46611-26), previously outlined in the January 2017 final rules. We wish to highlight consumer support for expanding the definition of GSLs, thereby doubling the number of lamp types covered.

The DOE's proposed rule would amend the definition of GSLs and GSILs to include nearly all of the most common types of light bulbs used by consumers. By expanding this definition, consumers will be able to benefit from more efficient LEDs beyond the classic pear-shaped light bulbs as other common household lighting products such as candelabra, globe and reflector lamps will be included. This will guarantee that consumers have access to the highly efficient, long-lasting LEDs anywhere in the nation and will enjoy lower utility bills. The proposed rule will also reduce demand for electricity, which helps to mitigate greenhouse gas emissions from powerplants, key contributors to climate change. We urge you to act promptly to finalize the broadened definition and swiftly apply improved standards.

Our support for expanding energy efficiency standards to nearly all household bulb types is in tandem with [our support](#) for DOE implementing the long overdue 45 lumens/watt minimum backstop standard for household lighting products¹. The delay in implementing the standard on January 1, 2020, as required by law, has already cost consumers well over a billion dollars in lost savings and caused the release of millions of tons of climate carbon into the air. Each month of additional delay will cost consumers \$300 million in higher electricity bills and result in 800,000 tons of additional carbon emissions being spewed into the atmosphere. Already since the beginning of the new administration, consumers will spend \$1.8 billion on

¹ As required by the Energy Independence and Security Act, Pub. L. 110-140, §321(a)(6)(A)(v).

inefficient lighting costs, and 4.8 million tons of carbon will be released needlessly into the air we breathe.

The case for implementing the backstop standard, with the expanded definitions, is clear; changing just one bulb from an incandescent bulb to an LED saves \$40 – \$90 over ten years. Using the midpoint of this estimate (\$65) and the average number of bulbs per US home (about 45) translates into \$3,000 per household in net savings over ten years.² While LEDs have become very popular, gaining an overall market share of about 60%, according to market research firm Apex Analytics, the 40% of sales that are still incandescent products are costing consumers dearly.³

Prompt adoption of the expanded GSL and GSIL definitions will ensure that all consumers benefit from up-to-date, energy-saving technology for almost every bulb needed in their homes. Low-income consumers, in particular, will see even greater benefits as they have energy bills that, on average, are disproportionately higher, and a majority of them are renters. Tenants, when moving into housing, can often find pre-installed lightbulbs to be older, inefficient incandescents or CFLs. Research in Michigan found that low-income consumers have less access to affordable replacement LEDs than other consumers because the stores they often shop at do not stock them or set prices high. Research in New York also showed that urban stores stock fewer LEDs than suburban stores. New standards will ensure that all consumers have access to low-cost, energy-efficient LEDs whether they buy their bulbs at big box suburban stores, grocery stores, hardware stores, dollar stores, or corner stores.

And, in addition to the direct savings on consumer electricity bills thanks to the transition to LEDs, there are also broader economic benefits from revising the definitions. When the commercial and industrial sectors save on lighting costs, these energy savings can be passed on to consumers in the form of lower costs for goods and services and can be spent in other areas of our economy with greater multiplier effects.

There is also widespread public support for the light bulb standards and LEDs. A 2019 CFA survey found two-thirds of respondents support federal efficiency standards for light bulbs, compared to fewer than one-third who oppose standards.⁴

² 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.

³ See <https://www.creedlightracker.com/>

⁴ The survey was conducted for CFA by Engine International by cell phone and landline on March 21-24, 2019, using a representative sample of 1007 adult Americans. The survey’s margin of error is plus or minus 3.09 percentage points at the 95% confidence level.

LEDs are no longer a new, expensive lighting technology, and manufacturers can now produce LEDs in almost every bulb type consumers purchase for their homes. Consumers who have made the switch to them enjoy not only the energy savings, but also the convenience of not having to replace them as often due to the long-life span of LEDs.

In closing, we strongly urge the Department to promptly adopt the revised definition, as well as implement the legally required “backstop” standard for light bulbs, which the previous administration failed to do. Consumers, particularly low-income consumers, should no longer be subject to higher electric bills because out-of-date, less efficient technologies continue to be made available in the marketplace.

Thank you for your consideration of our views.



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