

January 27, 2022

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

Re: Consumer Support for Proposed General Service Lamp and General Service Incandescent Lamp Backstop Requirement — In Relation to DOE Proposed Rulemaking: EERE–2021–BT–STD–0005

Dear Secretary Granholm:

Consumer Federation of America (CFA), and the National Consumer Law Center (NCLC) are writing in response to the Department’s [Notice of Proposed Rulemaking](#) regarding the backstop requirement for General Service Lamp (GSL) and General Service Incandescent Lamp (GSIL). We wish to highlight consumer support for more efficient lighting standards which will save billions of dollars in energy bills and eliminate millions of tons of climate-harming emissions. This reiterates prior comments we have submitted to the Department on multiple occasions over the past several years in favor of the backstop and its effective date of January 1, 2020.¹

The implementation of the 45 lumens/watt minimum backstop standard for household lighting products², including all the shapes and sizes added by the Obama Administration, needs to go into effect as soon as is practicable. 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 change emissions 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. Unfortunately, DOE failed to meet the year-end deadline. Based on typical rulemaking timelines, it now seems likely that a final rule implementing the backstop may not be published until the middle of 2022. This delay is costly. The Appliance Standards Awareness Project estimates that inefficient bulbs sold during just this six-month period will needlessly cost consumers \$1.8

¹ https://consumerfed.org/wp-content/uploads/2010/06/150223_DOE-GSLstandards_comments.pdf
https://consumerfed.org/wp-content/uploads/2016/05/5-16-16-DOE-Lighting-Rule_Comments.pdf
<https://consumerfed.org/wp-content/uploads/2017/01/cfa-comments-to-doe-regarding-efficiency-standards-for-lighting-products.pdf>
<https://consumerfed.org/wp-content/uploads/2019/05/CFA-NCLC-Comments-on-DOE-GSL-Rollback.pdf>
<https://consumerfed.org/wp-content/uploads/2021/06/DOE-GSL-Lighting-Standards-Consumer-Groups-Support-Letter.pdf>

² As required by the Energy Independence and Security Act, Pub. L. 110-140, §321(a)(6)(A)(v).

billion dollars in higher utility bills and add nearly 5 million metric tons of climate emissions to the atmosphere.

Consumers are already benefiting from more efficient LEDs, but even greater savings are achievable with the backstop requirement. 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.³ 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.⁴

Prompt implementation of the standard will ensure that all consumers benefit from up-to-date, energy-saving technology. 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. Revised 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, there are also broader economic benefits from implementing the backstop standard. 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 in our economy with greater multiplier effects.

There is also widespread public support for the light bulb standards. 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.⁵ Not surprisingly, consumers who have had experience with LEDs are much likelier to support efficiency standards compared to those who have no experience.

³ 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.

⁴ See <https://www.creedlightracker.com/>

⁵ 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 urge the Department to promptly put into effect the overdue, 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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cc: Dr. Stephanie Johnson, Office of Energy Efficiency and Renewable Energy, DOE