

October 21, 2013

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program
Mailstop EE-2J
EERE-2009-BT-STD-0018
1000 Independence Avenue ,SW
Washington, DC 20585-0121

Re: Energy Conservation Program for Consumer and Certain Commercial and Industrial Equipment:
Notice of Proposed Rulemaking for Metal Halide Lamp Fixtures, Docket # EERE-2009-BT-
STD-0018

Dear Ms. Edwards,

The National Rural Electric Cooperative Association (NRECA) appreciates the opportunity to submit comments on the Notice of Proposed Rulemaking for Metal Halide Lamp Fixtures, which was published by the Department of Energy (DOE or Department) at 78 Fed. Reg. 51164 (Aug. 20, 2013).

NRECA is the national service organization for more than 900 not-for-profit rural electric utilities that provide electric energy to over 42 million people in 47 states. Cooperatives own and maintain 2.5 million miles or 42 percent of the nation's electric distribution lines covering three-quarters of the nation's landmass. Electric cooperatives provide electric service in all or parts of 2,500 of the nation's 3,141 counties.

NRECA supports the Department's energy conservation standards program for certain consumer products and commercial and industrial equipment. The program has been one of the most successful energy efficiency efforts due to its focus on setting standards that are technically feasible and economically justified for a majority of consumers. The program's success can be largely attributed to its historical reliance on setting standard levels ensuring that customers save money.

We support the comments submitted by the National Electrical Manufacturers Association (NEMA), Edison Electric Institute (EEL), and American Public Power Association (APPA) and urge you to carefully consider their detailed comments. Specifically, NRECA is concerned that the long paybacks associated with the standards and several inaccuracies in the underlying economic justification for the proposed standards will create unnecessary costs to member coops looking to replace existing outdoor light fixtures. Specifically, we urge DOE to revisit the following issues:

1. Manufacturers and Consumers Are Entitled to the Full Three-Year Compliance Period Provided by EISA 2007.

The intent Section 324(e) of Energy Independence and Security Act of 2007 (EISA 2007) on metal halide lamp fixtures was to provide manufacturers with three years to make the necessary investments and changes to their manufacturing lines to adjust to the new standards. It also was to provide end-use



National Rural Electric Cooperative Association

A Touchstone Energy® Cooperative

customers time to make adjustments to their lighting decisions. While the statute may have specified January 1, 2015, as a compliance deadline, this was predicated on a final rule being published in January 2012. It is not reasonable to provide manufacturers, nor consumers, with less than one year to make the significant adjustments that would be required under the proposed rule.

2. Reliability Issues with Higher Efficiency Electronic Ballasts

Where the proposed rule calls for efficiency standards that will only allow the use of electronic ballasts for outdoor fixtures, NRECA is concerned for the following reasons that were highlighted at the workshop:

- Magnetic ballasts operate more reliably at extreme summer and winter temperatures.
- Magnetic ballasts handle transient voltage fluctuations (surges or sags) better than electronic ballasts.
- Magnetic ballasts are more suitable for wet locations.
- Magnetic ballasts are better at handling the heat from the metal halide lamp.

Also, based on the testimony, the electronic ballasts used for outdoor fixtures are larger and heavier than magnetic ballasts, which would make it harder to replace ballasts in existing fixtures.

3. New Fixtures and Replacement Ballast Issues

Based on the testimony at the workshop, this will be a new fixture standard, such that all new fixtures must contain ballasts that have the efficiency levels shown in the NOPR. However, there is the question of whether manufacturers will continue to make replacement ballasts for existing metal halide fixtures, due to the conditions of the market and competition from other lighting sources, especially LEDs, that are not subject to DOE regulations in the near future.

4. The Utility Sub-Group Economic Analysis Needs to be Revised

NRECA urges DOE to revise the economic analysis using recent regional values of wholesale power prices that are published by the Energy Information Administration every two weeks at: <http://www.eia.gov/electricity/wholesale/>.

Thank you for your review and consideration of our comments.

Respectfully submitted,

A handwritten signature in black ink that reads 'Keith Dennis'.

Keith Dennis
Senior Principal, End-Use Solutions and Standards
NRECA

cc: Jay Morrison, NRECA
Dave Mohre, NRECA