

April 30, 2019

The Honorable Rick Perry
Secretary, U.S. Department of Energy
Office of the General Counsel, GC-33
1000 Independence Avenue SW
Washington, DC 20585-0121
The.Secretary@hq.doe.gov

Docket Number: EERE-2018–BT–STD–0010, RIN:1904-AE26

Dear Secretary Perry,

On behalf of the [U.S. Climate Alliance](#), a bipartisan coalition of 24 governors representing 55 percent of the U.S. population and over 60 percent of the U.S. economy, I write with concern regarding the Department of Energy’s (DOE) [proposal](#) to repeal definitions for general service lamps, which account for a significant percentage of Americans’ total electricity consumed. The repeal will dramatically weaken energy efficiency standards that have saved residents in Alliance states hundreds of billions of dollars¹ while reducing energy use and greenhouse gas emissions. States in the U.S. Climate Alliance have committed to implementing policies that advance the goals of the Paris Agreement, and support energy efficiency standards as a proven way to do this while saving consumers and businesses money on their energy bills. Building upon the ambitious energy efficiency and emissions-reducing leadership being advanced across the U.S. Climate Alliance, Alliance states stand ready to take the steps necessary to protect the environmental and economic health of their residents.

Today’s LED light bulbs are an American success story, made possible by common sense, bipartisan energy efficiency standards enacted by the U.S. Congress and President George W. Bush in 2007. DOE itself supported innovation in this industry with an investment of \$400 million, which led to the development of new, efficient products that have saved U.S. consumers \$4.7 billion on their electricity bills over the past decade.² These standards have helped create a marketplace for low-cost, high-quality LEDs that have saved consumers money and reduced harmful pollution without disrupting the market or sacrificing consumer experience. As a result, DOE agreed in 2017 to expand the definition for general service lamps from the typical pear-shaped bulb to other types, including three-way bulbs, candelabras, reflector bulbs, and globe-

¹ ASAP/ACEEE Brief: US Light Bulb Standards Save Billions for Consumers But Manufacturers Seek a Rollback; *July 2018*.

² U.S. Department of Energy: DOE Solid-State Lighting Program: Modest Investments, Extraordinary Impacts; *October 2017*

shaped bulbs. The impact of the broader definitions is a substantial increase in savings from the existing lighting efficiency standards that become mandatory on January 1, 2020.

The DOE repeal of the light bulb definitions expansion would add nearly 34 million metric tons of CO₂ emissions in 2025 or the equivalent heat-trapping emissions of 7 million cars,³ and nearly half of the emissions – 16 million metric tons of CO₂ – would be in U.S. Climate Alliance states. This proposed repeal would also hurt consumers' pocketbooks and health. Consumers nationwide would lose at least \$12 billion each year in electricity bill savings by 2025, amounting to about \$100 per household per year. The additional electricity generation required would increase harmful pollution that contributes to health problems such as asthma.⁴ The proposed repeal would also stifle U.S. innovation and competitiveness and would slow the transition to high quality, energy-efficient products.

The U.S. Climate Alliance is committed to reducing greenhouse gas emissions and Alliance states believe that efficiency standards are cost-effective, common-sense policy to achieve those reductions. Repealing the expansion of these light bulb definitions would send us backward. On behalf of the U.S. Climate Alliance, I strongly urge DOE to withdraw the February 11, 2019 proposed rule.

Signed,



Julie Cerqueira
Executive Director
U.S. Climate Alliance

U.S. Climate Alliance

California | Colorado | Connecticut | Delaware | Hawaii | Illinois | Maine | Maryland | Massachusetts |
Michigan | Minnesota | Nevada | New Jersey | New Mexico | New York | North Carolina | Oregon |
Pennsylvania | Puerto Rico | Rhode Island | Vermont | Virginia | Washington | Wisconsin

cc:

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DOE docket; GSL2018STD0010@ee.doe.gov

³ ASAP/ACEEE Statement: Rollback of light bulb standards would cost consumers billions — \$100 per household each year; February 2019.

⁴ *Ibid.*