

To: File
From: Linda Graves
Date: June 1, 2010
Re: Ex parte discussion clarifying NEMA's comments

On May 25, 2010, Mahima Gupta, Ali Lehr, and Matthew Walker of Navigant Consulting met with Justin Neumann, Bob Erhardt, Susan Anderson, Pekka Hakkarainen, and John Green of the National Electrical Manufacturers Association (NEMA) at NEMA's headquarters in Rosslyn, VA. Bob Lingard, Gavin McCormick, Grant Williams, Natasha Collins, and Scott Morris of Pacific Northwest National Laboratories (PNNL) participated via teleconference. The NEMA representatives further clarified their public comments in response to the fluorescent lamp ballast energy conservation standard preliminary analysis and test procedure notice of proposed rulemaking (NOPR). The Navigant Consulting representatives asked questions of the NEMA representatives on topics related to the energy conservation standard preliminary analysis and the test procedure NOPR. PNNL representatives asked questions of the NEMA representatives on topics related to the energy conservation standard preliminary analysis.

NEMA representatives indicated general agreement with the DOE shipment forecast with the exception of the periodic oscillations. NEMA also indicated additional support for the emerging technology scenario, indicating fixed light output lighting will decline in shipments over time.

NEMA representatives indicated support for a lamp-based ballast efficiency metric for describing the energy efficiency of a ballast, though some had not fully considered whether they supported correlating to BEF or using BE directly. NEMA supports measurement of arc power for the output measurement, and ballast input power for the input measurement. One NEMA representative described an alternative proposal for the measurement of ballast factor. In this alternative method, ballast factor is calculated as measured lamp arc power divided by the ANSI defined arc power associated with a ballast factor of one.

NEMA representatives provided additional guidance on efficiency trends in ballasts based on changing certain performance characteristics (ballast factor, number of lamps, starting method, lamp type), and suggested reasonable techniques for estimation of manufacturer production costs, including marking down retail prices with a scaling technique. NEMA representatives also discussed the future regulatory environment outside of federal energy conservation standards, including CEC standards, ASHRAE standards, and end of life requirements.

Finally, NEMA representatives voiced concern over the reported energy efficiency value for certification and enforcement. NEMA indicated that the analysis for development of standards should be based on the same values used for certifying compliance with standards.

End of conversation.