



Consumer Federation of America
1620 I Street, N.W., Suite 200 * Washington, DC 20006



March 9, 2011

The Honorable Jeff Bingaman
The Honorable Lisa Murkowski
Energy and Natural Resources Committee
304 Dirksen Senate Building
Washington, DC 20510

Dear Chairman Bingaman and Ranking Member Murkowski:

Consumers Union,¹ Consumer Federation of America, National Consumer Law Center, Public Citizen and National Consumers League strongly support efficiency standards for lighting, appliances, electronics, buildings, and vehicles. We commend you for your leadership and effective bipartisan efforts to promote energy efficiency. Because of the cost savings for consumers and general public benefits of current lighting standards, we oppose current efforts to repeal lighting standards scheduled to go into effect on January 1, 2012.

Minimum efficiency standards provide basic assurance of efficient performance for many significant consumer purchases. Efficiency standards have enhanced the numerous lighting options for consumers to choose from, as inefficient models have been scheduled to phase out of the market and new options to replace them have been developed. The new standards are estimated to save consumers billions of dollars in energy costs over the coming years. Depending on the technology selected, consumers can save between \$20 and \$90 per 100W fixture by selecting a more efficient bulb, as shown in the chart below.

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Type of bulb	Watts	Cost/bulb (longevity) ²	Operating cost over 10,000 hrs ³	Total cost over 10,000 hrs	Consumer savings over 10,000 hrs
Traditional Incandescent	100	\$.75 (1,000 hrs)	\$115	\$122.50	Baseline cost
Efficient Incandescent (halogen)	72	\$2.00 (1,000 hrs)	\$82.80	\$102.80	\$19.70
Compact fluorescent (CFL)	26	\$1.50 (6,000 hrs)	\$29.90	\$32.90	\$89.60
Solid State Lighting ⁴ (LED)	13	\$50 (50,000 hrs)	\$14.95	\$64.95	\$57.55

Another way of looking at the consumer savings is how quickly efficient bulbs would pay for themselves and start providing consumers a return on their investment. If a consumer replaced one 100-watt incandescent (\$.75) with one 72W efficient incandescent (\$2), payback would accrue approximately one-third of the way through the life of the bulb, in about 388 hours or 6 months, assuming the bulb is used 2 hours/day. If the consumer instead selected a 26-watt CFL (\$1.50), the savings would begin after a mere 88 hours of usage, and the benefits would accrue long beyond that due to the longer bulb life. For a 13W LED (\$50) replacement, savings would begin much later, after 4,625 hours, but the savings over the life of the bulb are significant at \$487.75, and the purchase price of LED bulbs is expected to drop significantly.

Improving safety throughout the lifecycle of a product is also very important, and Congress should develop a comprehensive recycling program for light bulbs, particularly CFLs, in order to recapture mercury or other possible toxics used in new light bulbs and prevent them from contaminating landfills. Recycling programs may also be required for LEDs as we learn more about the toxic materials present. However, it is important to note that CFLs save between 2 and 10 times more mercury from the environment than is used in the bulb because their efficiency avoids mercury pollution that would otherwise be emitted from coal-fired power plants.

Well-designed efficiency standards have helped drive the market towards higher quality, more innovative technologies that cost less for consumers to operate over the life of the product. Efficiency standards also help lower costs of new energy

² Performance based on manufacturer projections. Products in use are likely to see variation.

³ Assumes national average of 11.5 cents/kWh.

⁴ 100-Watt replacement: LEDs are still in development and may not yet meet 1600-lumen equivalency. Lighting fact labels will be required beginning in 2012, which will enable consumers to verify equivalency.

efficient technology by providing economies of scale. The result is higher efficiency products that are more affordable to own and operate and more widely available.

In 1999, the CFLs Consumers Union tested cost \$9 to \$25 per bulb. In contrast, those tested in 2010 only cost \$1.50 to \$5 per bulb, had shown marked improvement in performance, and provided significant cost savings to consumers. Largely as a result of efficiency standards, refrigerators now use 70% less energy than they did thirty years ago, despite the fact that the average cost has declined and enhanced features have multiplied. Another dramatic example of the benefit of efficiency standards has been increasing fuel economy standards for vehicles, which have saved consumers billions of dollars in fuel costs.

Efficiency standards are also important because they provide a host of public benefits in addition to those accrued by individual consumers. It is often the case that some choices are pre-determined for consumers in the built environment. Utility ratepayers, especially renters and new homeowners, often move into homes where they did not select the lighting or appliances in the home. Improved minimum standards of efficiency help curtail the utility bills they must pay when they did not have the option to select cost-effective efficiency measures that would benefit them. Lower utility bills and decreased energy demand help all consumers and ratepayers by taking pressure off the power grid, decreasing the need for more power plants, and decreasing pollution in their communities.

We strongly believe that Congress should continue to move efficiency standards forward, not backward. We will continue to provide guidance for consumers in comparing new lighting options and understanding new lighting labels. We thank you again for your commitment to energy efficiency that benefits consumers and urge you to oppose any repeal of lighting efficiency standards.

We thank you for your attention to this important consumer matter.

Sincerely,

Shannon Baker-Branstetter
Consumers Union

Sally Greenberg
National Consumers League

Mel Hall-Crawford
Consumer Federation of America

Tyson Slocum
Public Citizen

Charlie Harak
National Consumer Law Center, on behalf of its low-income clients

Cc: Senate Energy and Natural Resources Committee Membership