



January 26, 2022

Honorable Jennifer Granholm  
Secretary  
U.S. Department of Energy  
1000 Independence Ave., SW  
Washington, DC 20585  
Via [GSL2021STD0005@ee.doe.gov](mailto:GSL2021STD0005@ee.doe.gov)

Subject: EERE–2021–BT–STD–0005, General Service Lamps NOPR

**Dear Secretary Granholm:**

The National Association of State Energy Officials (NASEO) appreciates the opportunity to comment on this important docket concerning the U.S. Department of Energy’s (DOE) proposed implementation of a general service lamps (GSL) backstop standard.

We agree with the DOE finding that the law requires implementation of a 45 lumen-per-watt backstop standard for GSLs sold in the United States.<sup>i</sup> We note analyses performed for DOE that estimate consumer savings of \$2.7 billion annually and 222 million metric tons of cumulative avoided carbon dioxide-equivalent (CO<sub>2</sub>e) emissions to 2050 from implementing the standard.<sup>ii</sup>

Prompt implementation of the standard will benefit all consumers but will especially help low- and moderate-income households that spend a higher share of their incomes on energy. The backstop standard will ensure that all consumers have ready access to affordable, efficient lighting.

This proposed rule is important to the states, which rely on cost-effective federal appliance and equipment energy efficiency standards (for GSL and other products) to help them meet their energy affordability, air quality, climate, electric reliability, and energy resilience goals.

While DOE was unable to complete work on the GSL standard by the December 31, 2021, target set forth in President Biden’s Executive Order 13990, we urge DOE to finalize and implement the backstop standard as soon as possible.

Thank you for considering this input.

Best regards,

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<sup>i</sup> 86 Federal Register 70760 and 70767

<sup>ii</sup> Kantner, C.L.S., M. Ganeshalingam, R. Hosbach, L. Zavodivker. "Impact of the EISA 2007 backstop requirement on general service lamps." Lawrence Berkeley National Laboratory. December 2021. pp 18-20.