



# Oregon

Kate Brown, Governor



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June 24, 2021

Honorable Jennifer Granholm  
Secretary, US Department of Energy  
1000 Independence Ave. SW  
Washington DC 20585

**Re:** Energy Conservation Program: Backstop Requirement for General Service Lamps;  
Request for information

Honorable Secretary Granholm,

The Oregon Department of Energy (ODOE) appreciates the efforts of the United States Department of Energy to re-evaluate the definitions and energy efficiency standards for General Service Lamps (GSLs). ODOE also appreciates the opportunity to provide comment on this potential activity.

Product energy efficiency standards, including GSL standards, benefit consumers by saving energy, reducing costs, and reducing GHG emissions. Federal standards provide consistency in the marketplace, and enhance equity by ensuring widespread access to efficient products for all consumers. **As such, ODOE urges the United States Department of Energy to promptly move forward with implementing the expanded GSL definitions from January 2017, as well as the efficiency standard update to 45 lumens per watt** that was previously due to become effective in January 2020 but has not yet been implemented.

Thank you again for the opportunity to comment on efficiency standards for General Service Lamps. ODOE respectfully submits these comments for consideration. Please do not hesitate to contact our agency should you have any questions or need additional information.

Respectfully,

Janine Benner  
Director, Oregon Department of Energy