



National Electrical Manufacturers Association

March 19, 2018

Honorable Christopher Bray  
Chairman  
Senate Committee on Natural Resources and Energy  
Vermont State House  
Room 8  
115 State St.  
Montpelier, VT 05633

Dear Chairman Bray and Members of the Committee:

I write to express the National Electrical Manufacturers Association's (NEMA) opposition to H. 410, which includes High Color Rendering Index (CRI) Fluorescent Lamps. We appreciate the opportunity to offer insights into the potentially negative and likely unintended consequences this could have on Vermont residents.

The standards set in this bill for High CRI Fluorescent Lamps would effectively ban the sale of High CRI T12 lamps in Vermont. These type of Fluorescent lamps have typically been used in residential applications, usually operated in fixtures with low power "shoplite" ballasts. If these T12 lamps cannot be sold in Vermont, residents will have no suitable replacement lamps for their fixtures; neither T8 fluorescent lamps nor linear LEDs (TLEDs) will work in the High CRI T12 fixtures due to the specific ballast that accommodates the High CRI T12s. Residents who have these fixtures will be forced to replace current fixtures if they need a replacement lamp, incurring additional costs – first for the new fixture and, in many cases, for the cost of an electrician to install it. This is a burdensome task for a Vermonter who simply needs to replace a light bulb.

Second, the potential energy savings by banning High CRI T12 lamps claimed by advocacy groups appear to be greatly overstated. NEMA conducted a study on potential energy savings and found that approximately 1% of the energy savings claimed in the *States Go First* report from the Appliance Standards Awareness Project (ASAP) would actually be attainable by banning High CRI T12 Fluorescent Lamps. NEMA would welcome the opportunity to discuss our energy savings findings with the Committee. We are concerned about the substantial burden to be placed on Vermont residents in the pursuit of questionable energy savings claimed by ASAP.

For these reasons, we recommend striking High Color Rendering fluorescent lamps from H. 410. For further discussion, clarifications or questions, please contact my colleague, Madeleine Bugel at [Madeleine.Bugel@nema.org](mailto:Madeleine.Bugel@nema.org) or 703-841-3222.

Sincerely,

A handwritten signature in blue ink that reads "Kyle Pitsor". The signature is fluid and cursive.

Kyle Pitsor

Vice President, Government Relations  
National Electrical Manufacturers Association