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**US FEDERAL OUTDOOR LIGHTING ENERGY EFFICIENCY LEGISLATION :
A POSITION STATEMENT FROM THE INTERNATIONAL ASSOCIATION OF LIGHTING DESIGNERS**

CHICAGO, IL USA, 15 MAY 2009 – The International Association of Lighting Designers (IALD), established in 1969, is a global organization of lighting design professionals who satisfy its rigorous qualification process. IALD members are specifically prohibited from profiting from the equipment we specify. Therefore, our members are truly objective parties seeking to achieve sustainable lighting solutions for the built environment. Our members are distinguished by a unique blend of aesthetic and technical expertise, and operate at the highest level of integrity to create a better world through leadership and excellence in lighting design. We use our expertise to support the interests of the users of buildings and of the exterior nighttime environment—the general public.

It is our understanding that proposed amendments to the Senate Energy Bill related to outdoor lighting, including both lighting associated with buildings and street lighting, are due for mark-up and eventual floor consideration in both houses of Congress.

THE IALD RECOMMENDS THAT THESE AMENDMENTS INCORPORATE A FEW KEY POINTS WHICH ARE CRITICAL TO SUCCESSFUL ENERGY CONSERVATION AND ENHANCED EFFICIENCY OVER A 20-30 YEAR TIMEFRAME:

1. **Application Approach:** Adopt a systemic, total application efficiency-based approach, *not* a lamp or fixture efficacy approach. Standards and incentives that regulate the energy performance of the total lighting application while maintaining lighting quality are the most effective way to increase lighting energy efficiency and reduce energy waste.
2. **Street Lighting:** For roadway and street lighting, require the Department of Energy to conduct a rulemaking process to develop an effective energy efficiency standard. This process should focus on total application efficiency.
3. **Building Sites:** For lighting associated with buildings (e.g., parking lots, walkways, etc.), apply ASHRAE/IESNA 90.1, which is an application-based standard.
4. **Controls:** Require or incentivize lighting control technologies that will turn off lights when not needed.
5. **Incentives:** Use incentives for improvement, such as accelerated depreciation for investments, rather than prohibitions of specific types of equipment.

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BACKGROUND :

- **Application Approach:** A lighting fixture is part of a larger lighting application that includes multiple types of fixtures in varied locations, the areas and objects to be illuminated, and the needs of the people occupying the space. Regulating lighting energy efficiency should be done by regulating the efficiency of the whole lighting application – what is often called application efficiency. The “appliance standards” approach used in the current draft amendment falls down on the fact that lighting fixtures are not self-contained systems such as cars or refrigerators; they are component parts of larger systems. Such an approach is unlikely to improve energy efficiency or be cost effective, can degrade lighting quality, and is fraught with potential loopholes, interpretation problems, and possible inadvertent banning of efficient technology. Seeking to regulate energy use by regulating only the light fixture is analogous to trying to regulate automobile efficiency only by specifying the efficacy of the engine—it would be possible to have a very efficient engine in an overweight or aerodynamically deficient car.
- **Street Lighting:** The IALD endorses the idea of requiring the Department of Energy to engage in a rulemaking process to develop a true energy efficiency standard for street lighting. We believe in an application efficiency approach that supports high quality lighting, rather than fixture efficacy metrics. Fixtures direct the light to where it is needed, shielding the light from causing glare, light trespass, and pollution to the night sky. This reduces fixture efficacy but *increases* overall application efficiency. More light is placed where it is needed for every watt used. Regulating the amount of energy that can be used by the whole lighting application allows high quality results and ensures reduction in energy use. If fixture efficacy (e.g., LPW or Lumens-Per-Watt) metrics must be used as a temporary measure until a proper standard is in place, it is important to set the limits so that energy efficiency can be achieved without degrading lighting quality or increasing glare and light pollution.
- **Building Sites:** At present, overlighting of parking lots is a major cause of energy waste in outdoor lighting, not the use of inefficient lamp and fixture technologies. Truly effective energy efficiency regulation for outdoor lighting must control overlighting and waste. The IALD recommends that the legislation adopt the approach and standards incorporated in ANSI/ASHRAE/IESNA 90.1. ANSI/ASHRAE/IESNA 90.1, while not perfect, does use an application approach to energy limits.
- **Controls:** An energy standard should not simply regulate how much power (watts) is connected, but how much energy (kwh) is used over time. Simply put – the most energy-efficient lighting system is the one that is turned off. The IALD supports true energy standards that require or incentivize the use of adaptive control technologies which reduce light levels in response to need.
- **Incentives:** The IALD believes that incentives for improvement, rather than prohibitions of specific types of lamps or fixtures, are the most effective way to achieve energy conservation goals and increased efficiency. Mandating specific technology performance standards for only a portion of the lighting system (i.e., lamps and fixtures) leads to the “appliance standards” problem outlined above.

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The IALD strongly advocates major improvements in lighting energy efficiency and improved lighting quality through an application efficiency approach. Total lighting system application efficiency should be regulated. Mandating the individual efficacies of lighting fixtures, which are only parts of a complete lighting application, will not ensure energy efficiency or lighting quality. IALD lighting designers stand with the vast majority of the lighting industry in supporting an expansion of performance and application-based energy conservation standards, and government incentives to increase energy savings and promote economic growth.

IALD members and representatives are prepared to discuss the issues we have raised and to extend the understanding of our views of light and lighting as key tools to human success and productivity.

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The International Association of Lighting Designers (IALD), established in 1969, is an international organization supporting a network of 800 lighting design professionals who satisfy its rigorous qualification process. Its members are distinguished by a unique blend of aesthetic and technical expertise, and operate at the highest level of integrity to create a better world through leadership and excellence in lighting design; to cultivate the universal acknowledgement and appreciation of the Power of Light in human life.