

## **NEMA Position on Prohibiting the Use of Funds for Enforcing the EISA 2007 Light Bulb Efficiency Standards**

The National Electrical Manufacturers Association, representing over 95% of the U.S. lighting manufacturing industry, remains committed and supportive of the lighting standards established in EISA 2007. NEMA **opposes** funding limitations imposed on the Department of Energy to enforce the incandescent light bulb standards. This is problematic for numerous reasons.

- American manufacturers have already invested millions of dollars in transitioning to energy efficient lighting as a result of the EISA 2007 provision. Any delay in enforcement will undermine those investments and create regulatory uncertainty.
- The inability of the Department of Energy to enforce the standards will allow bad actors to sell their non-compliant products in the US without fear of enforcement, creating a competitive disadvantage for compliant manufacturers.
- Even if DOE does not have the funds to enforce the standards, EISA 2007 gave state AGs the ability to enforce. A lack of DOE enforcement will create consumer confusion due to a patchwork of state standards enforcement and place manufacturers in an intolerable position due to uneven and potentially unpredictable enforcement.
- The EISA 2007 language does not ban incandescent light bulbs.
- Consumers will have expanded lighting options that include:
  - advanced incandescent,
  - compact fluorescent lights (CFLs), and
  - new lighting technologies such as light-emitting diodes (LEDs)
- Lighting accounts for about 12% of energy use in homes. While individual home usage varies, it is estimated that the average household savings associated with this transition is over \$100 per year, every year going forward. Overall national energy savings from the new standards is estimated at \$10-15 billion per year, every year going forward, depending on assumptions of usage and what type of technology is selected to replace traditional incandescent.