



STATE OF WASHINGTON  
DEPARTMENT OF COMMERCE  
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May 1, 2019

The Honorable Rick Perry  
Secretary, U.S. Department of Energy  
Office of the General Counsel, GC-33  
1000 Independence Avenue SW  
Washington, DC 20585-0121

Re: Docket Number: EERE-2018-BT-STD-0010, RIN: 1904-AE26

Dear Secretary Perry:

On behalf of the State of Washington, I would like to express our concern and opposition regarding the proposal by the Department of Energy to repeal definitions of general service lamps. This action would increase costs for consumers and businesses across the nation, weakening our economy and increasing the wasteful use of scarce natural resources.

The State of Washington is looking forward to the implementation of the expanded federal standard in January 2020 and to the benefits that will accrue to consumers and businesses in this state. Indeed, earlier this month the Washington State Legislature passed legislation that supports and reinforces the standards for general service lamps as established in 2017 by the Department of Energy. This legislation, House Bill 1444, is pending signature by Governor Jay Inslee. The Washington State standard applies to all of the products that were added by the Department of Energy in 2017.

While the State of Washington has taken action to protect consumers and businesses in this state, we do not see state-enacted standards as the preferred solution for this category of products. The better outcome is for the Department of Energy to maintain the product definitions established in 2017 for the entire nation. This will ensure that our entire nation has access to high-efficiency lighting products that avoid billions of dollars of excess utility bills.

Thank you for considering these comments.

Sincerely,

Michael Furze, Assistant Director  
Energy Division