



Members,

The Department of Energy rulemaking for General Service Lamps (GSLs) rulemaking process sets minimum lamp efficacy (lumens per watt) requirements for all GSLs manufactured in or imported into the USA. The final rule for GSLs, was published April 19, 2024, and will go into effect July 3, 2024 and compliance with the updated minimum efficacy criteria will be required on and after July 25, 2028.

The DLC has performed a preliminary analysis of the DOE's [GSL Final Rule](#). This analysis reveals that there are several DLC PUDs that have efficacies that are significantly lower (>10% lower) than the minimum efficacies in the final GSL rule. The total DLC listed lamp quantities affected by this new rule appear to be small (about 10K lamps, 3% of total SSL QPL listings).

What is affected?

For DLC Categories, the biggest group of products affected are 4' and 8' linear lamps (TLEDs) including T8, T5, T5HO diameters (DOE Product class: Integrated and Non-Integrated Omnidirectional Long GSLs) which have efficacy requirements that are significantly lower (>30% lower) than the minimum efficacies in the final GSL rule. These include:

- Type B TLEDs (Integrated: powered by driver integrated in the lamp)
- Type A TLEDs (Non integrated: powered by fluorescent ballast in fixture)
- Type C TLEDs (Non integrated: powered by LED driver outside the lamp)

Also affected, but less dramatically:

- Shorter TLEDs (2', 3', 2G11, Ubend, integrated and non integrated) because the efficacy increase is less (approx. 10% difference)
- LED lamps intended to replace pin based CFLs (CFLEDs) is a limited quantity (approx. 600 products)

The following table contains the DOE GSL description with the associated DLC lamp Primary Use Designations (PUDs) affected, the quantity of listed products for each group, the V5.1 efficacy threshold, the DOE GSL thresholds and the differential.

We will be discussing this rule and the potential impacts on products and in programs in the May 30, 2024 Member meeting. Please review the table in advance and consider how your programs would be affected. We will be polling the group to get a better understanding. As always, we appreciate your participation and feedback.

Best Regards,

Karla Winter

DOE Product Class name	DLC PUD (with <= 3300 lumens)	Number of products listed on SSL QPL	DLC minimum efficacy in V5.1 (lm/W)	DOE minimum efficacy on 7/25/2028 (Lm/W)	DLC efficacy difference (below DOE)
Integrated Omnidirectional Long GSLs, No Standby Power (>= 45 inches)	<ul style="list-style-type: none"> 4' T8 Lamps, Type B 4' T5 Lamps, Type B 4' T5HO Lamps, Type B 8' T8 Lamps, Type B 	5735	120	174.1	-31%
Non-integrated Omnidirectional Long GSLs, No Standby Power (>= 45 inches)	<ul style="list-style-type: none"> 4' T8 Lamps, Type A, C 4' T5 Lamps, Type A, C 4' T5HO Lamps, Type A, C 8' T8 Lamps, Type A, C 	1481	120	195.4	-38.6%
Non-integrated Omnidirectional Short GSLs, No Standby Power (< 45 inches)	<ul style="list-style-type: none"> 2' T8 Lamps, Type A, C 3' T8 Lamps, Type A, C U Bend Lamps, Type A, C 	704	120	133.3	-10%
	<ul style="list-style-type: none"> Four Pin Base Replacement Lamps for CFLs (Vertically Mounted Lamps) Type A Four Pin Base Replacement Lamps for CFLs (Horizontally Mounted Lamps) Type A 	426	85		-36%
	<ul style="list-style-type: none"> 2 G11 Base Lamps, Type A 	47	120		-10%
Integrated Omnidirectional Short GSLs, No Standby Power (< 45 inches)	<ul style="list-style-type: none"> 2' T8 Lamps, Type B 3' T8 Lamps, Type B U Bend Lamps, Type B 	1587	120	124.6	-3.6%
	<ul style="list-style-type: none"> Four Pin Base Replacement Lamps for CFLs (Vertically Mounted Lamps) Type B Four Pin Base Replacement Lamps for CFLs (Horizontally Mounted Lamps) Type B 	0	85		-31.7%
	<ul style="list-style-type: none"> 2 G11 Base Lamps, Type B 	99	120		-3.6%