

European Commission
DGENER
att. Mr. Leo Wierda

15. July 2015
Ref. SFC
Building and Energy Efficiency

By e-mail

The Danish Energy Agency (DEA) is grateful for the opportunity to provide some last comments on the draft task reports 1 to 6 of the Lot 8/9/19 Ecodesign Preparatory Study on Light sources.

LED efficacy and LED price projections

We regard your request (e-mail 10th of July 2015) for LED efficacy and LED price projections as primarily directed to the industry. We have noticed that the study already has used the DEA - CLASP Report on European LED Market of 16th of March 2015.

Comments on the draft study reports 1 to 6

Product scope:

It is important for the understanding of the Lot 8/9/19 study that the product scope and the interface towards Lot 37 on Lighting Systems is kept in mind.

Considerations on the product scope are given in the Task 1 report but a conclusive survey of the division of products between the two studies is not presented.

For ease of understanding the Task 4, 5 and 6 report and later the Task 7 report a summary of the product scope and division between the studies should be inserted. This could be a schematic survey or table. Understanding what is included is helped by also showing what is excluded.

The table 3 of task 4 and table 1 of task 5 are surveys of products included in the base cases, but it is not clear what is excluded and left over to Lot 37.

LED retrofit for HID-lamps:

In Task 6 the LED-option for HID lamps is obviously some kind of LED-retrofit; however such retrofit options are very sparsely available and will probably never be available for the very common clear HPS and MH lamps as used in road lighting.

Therefore it should be clearly explained and shown that the LED-options for HPS and MH lamps are imaginary and only are included only to show that even if a 2020 LED-retrofit option was possible it would not be beneficial.

We suppose that more realistic LED-options for HPS and MH lamps are addressed in Lot 37 as luminaire replacement options. This should also be noted in the Lot 8/9/19 Task 6 report.

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Yours sincerely

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