

April 6, 2022

BY EMAIL

1. **Washington Utilities and Transportation Commission**, David Danner, Chair, dave.danner@utc.wa.gov
2. **Puget Sound Energy**, Lorna Luebbe, General Counsel, lorna.luebbe@pse.com
3. **Futurewise**, Alex Brennan, Executive Director, alex@futurewise.org
4. **Washington Environmental Council**, Alyssa Macy, CEO, alyssa@wecprotects.org
5. **Washington State Energy Office**, Todd Currier, Executive Director, curriert@energy.wsu.edu
6. **Washington House of Representatives, Environment and Energy Committee**, Joe Fitzgibbon, Chair, joe.fitzgibbon@leg.wa.gov
7. **Association of Washington Cities**, Alicia Martinelli, Interim CEO, aliciam@awcnet.org
8. **Idaho Power Company**, Patrick Harrington, General Counsel, pharrington@idahopower.com
9. **University of Washington, Clean Energy Institute**, Daniel Schwartz, Director, dts@uw.edu
10. **Sustainable Seattle**, Natalie Garcia, Co-director, natalie@sustainableseattle.org
11. **Conservation Northwest**, Mitch Friedman, Executive Director, mitch@conservationnw.org

Re: The LED Fraud

Dear Washington Energy Stakeholders,

Luminous Efficacy is a measure of the luminous efficiency of a light source. It is the ratio of the total luminous flux emitted to the total power input, expressed in lumens per watt. **Energy Efficiency** is providing the same quality of service using less energy. For an illumination device to be energy efficient, the device must not only increase the luminous efficacy, but the device must also retain the same quality of service. Since LEDs are a narrowly focused, non-uniform energy beam, LEDs do not provide the same quality of uniform illumination, and therefore LEDs cannot be claimed to be energy efficient.

The switch to LED lighting has been a catastrophe, severely damaging the natural night resource and causing great harm to human health. The switch to LED lighting is based on the false premise that LEDs are energy efficient. It is now time to admit that the switch to LEDs was a failure based on a myth of energy efficiency and that we must remove nearly all LED lighting because it is of such low quality that it is wrecking our entire ecosystem and has proven to be unsafe and discriminatory.

Our goals are to protect human health, to eliminate discriminatory barriers for those who are disabled by LED light, and to restore the natural night resource to its unpolluted state. We request a response to the questions posed below which will allow us to progress towards those goals.

- 1) Do you agree with the US Department of Energy and others that the definition of “energy efficient” is providing the same quality of service using less energy?
- 2) Do LEDs emit high-quality, uniform light just like incandescent and High-Pressure Sodium?
- 3) Do you agree that using only Luminous Efficacy in lumens per watt is not a valid method of comparing energy efficiency for lighting because it ignores the quality of the light?
- 4) Do you agree that blue wavelength light is an eye hazard?
- 5) Do you agree that LED light can trigger epileptic seizures, migraines, and panic attacks in a way that incandescent and HPS never did?
- 6) Do you agree that the switch to LEDs did not save energy, but simply reduced the quality to an industrial, low-quality, light with non-uniform energy?

Sincerely,

Mark Baker

Mark Baker
President

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