

This final document represents the definitive view of the agency on the questions addressed and may be relied upon by the regulated industry and members of the public.

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Guidance Type: Test Procedures, Definitions and Scope of Coverage

Category: Lighting Products

Equipment: Illuminated Exit Signs

Guidance Version: FINAL

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Q: Are illuminated exit signs with integrated egress lighting or other auxiliary functions covered by Federal energy conservation standards?

A: Yes, the Federal energy conservation standards for illuminated exits signs apply to products with auxiliary functions such as integrated egress lighting (sometimes referred to as combination exit signs). However, the standard applies to the exit sign, not to other components (e.g., egress lighting, alarms). Manufacturers of these products may require a waiver from the DOE test procedure to test and generate representative results for the energy consumption of certain basic models.

Federal energy conservation standards require that illuminated exit signs manufactured on or after January 1, 2006, have an input power demand of 5 watts or less per face. 10 CFR § 431.206; *see also* 42 U.S.C. § 6295(w).

DOE understands that certain manufacturers of illuminated exit signs with integrated egress lighting or other auxiliary functions have been operating under a mistaken belief that Federal energy conservation standards do not apply to such units. To clarify, any illuminated exit sign that meets each element of the relevant product definition¹ is a covered product under the statute and DOE's regulations. The addition of ancillary features or hardware would not transform the illuminated exit sign into a non-covered product or otherwise move it beyond the applicable regulatory requirements, although the added features or hardware are not subject to the energy conservation standard.

DOE recognizes that using the current DOE test procedure to test illuminated exit signs that incorporate integrated egress lighting or other ancillary features may result in measured values that are not representative of solely the illuminated exit sign component's energy efficiency. In contrast to models without ancillary features such as egress lighting, these combination exit sign models must have a larger battery capacity to operate the emergency lights for at least 90 minutes after the main power supply is disrupted, per National Fire Protection Agency (NFPA) requirements. NFPA 101 § 7.9.2.1. The onboard

¹ The term "illuminated exit sign" means a sign that — (A) is designed to be permanently fixed in place to identify an exit; and (B) consists of an electrically powered integral light source that — (i) illuminates the legend "EXIT" and any directional indicators; and (ii) provides contrast between the legend, any directional indicators, and the background. 42 U.S.C. § 6291(37); 10 C.F.R. § 431.202.

battery charger is an auxiliary power draw that, when charging, typically results in an increase in the total input power demand beyond the power required to operate the illuminated sign faces alone.

Because DOE's current test procedure does not provide a methodology for excluding the power consumed for charging the battery used to power features other than the exit sign faces, manufacturers of basic models with this feature may seek a waiver from the DOE test procedures to test and certify these models if they do not believe the result of the DOE test procedure is representative of the exit sign's energy efficiency. Additional details regarding how to obtain a test procedure waiver are available in 10 C.F.R. parts 430 (consumer products) and 431 (commercial and industrial equipment).

It is DOE's [enforcement policy](#) to refrain from pursuing an enforcement action while a test procedure waiver request is pending. DOE has also initiated a test procedure rulemaking for illuminated exit signs, with related rulemaking documents to be subsequently published in the *Federal Register* and posted on the DOE website.

This final version contains modifications reflecting comments received on the June draft.