

**Ron Yasny - Docket No. 12-BSTD-1**

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**To:** "'ryasny@energy.ca.gov'" <ryasny@energy.ca.gov>  
**Date:** 4/4/2012 3:33 PM  
**Subject:** Docket No. 12-BSTD-1  
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<b>DOCKET</b>	
<b>12-BSTD-1</b>	
<b>DATE</b>	APR 04 2012
<b>RECD.</b>	APR 05 2012

Dear Mr. Yasny,

Thank you for the opportunity to provide public comments on the proposed 2013 revisions to the California Building Energy Efficiency Standards and Green Building Standards Code.

While Stanford University is generally supportive of the proposed updates and strengthening of the standards, *Part 6, Section 149 (proposed Section 141) - Nonresidential Indoor Lighting Alterations* currently contains a requirement that we believe will be counter to the intended goal of improving energy efficiency and potentially harmful to the university. Specifically, the proposed language stipulates that a permit and compliance is required when more than 40 luminaires (i.e. light fixtures) are modified in place and when more than 10% of these luminaires are modified in an enclosed space (i.e. a room). When luminaires are altered without changing their location, it is classified as a "luminaire modification in place." As currently written, it does not apply to lamp (i.e. bulb) replacements alone but it does apply to lamp and/or **ballast** replacements for fluorescent fixtures.

Our concern is that this change would mean that group re-lamp/re-ballast projects must obtain a permit and comply with Lighting Power Density (LPD) and enhanced controls requirements for the first time. We believe the additional expertise (someone to calculate the post-project LPD and specify the necessary controls), labor and material cost, and time (2-6 months lead time for building permits) needed to do this will have the unintended consequence of discouraging group re-ballasting projects. Instead, building owners such as Stanford University will likely go back to "replace-on-failure" maintenance strategies and/or only touch ballasts in groups small enough to avoid triggering T24 compliance, either of which will result in missed opportunities for efficiency improvements.

Our proposed solution is to **exclude** simple lamp and/or ballast replacements from the definition of "luminaire modification in place".

Specifically, we suggest editing Section 141.0(b)1.i.ii.b. as follows:

"To qualify as a Luminaire Modification-in-Place, lighting systems shall be modified in only one or more of the following methods:

~~1. Replacing lamps and/or ballasts.~~

~~1.2.~~ Changing the number or type of light source in a luminaire including socket renewal, removal or relocation of sockets or lampholders, and/or related wiring internal to the luminaire including the addition of safety disconnecting devices.

~~2.3.~~ Changing the optical system of a luminaire in part or in whole.

~~3.4.~~ Installing lighting control systems devices or class 2 wiring for lighting controls only.

~~4.5.~~ Replacement of whole luminaires one for one in which the only electrical modification involves disconnecting the existing luminaire and reconnecting the replacement luminaire."

Sincerely,

Joseph Stagner

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