



April 12, 2012

CALIFORNIA ENERGY COMMISSION
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

DOCKET

12-BSTD-1

DATE APR 12 2012

RECD. APR 13 2012

Re: Docket Number 12-BSTD-01

Dear CEC Staff:

We appreciate the opportunity to provide comments on the proposed language for the 2013 Building Energy Efficiency Standards. This comment addresses the luminaire requirements of Part 6 Section 150.0(k) and Part 11 Appendix A4.2.1.C, specifically as pertaining to night lights.

Night lights are addressed within the 45 day language of Section 150.0(k) as follows:

150(k)1 E. Night Lights. Permanently installed night lights and night lights integral to installed luminaires or exhaust fans shall be rated to consume no more than five watts of power per luminaire or exhaust fan as determined in accordance with Section 130.0(c).

According to Table 150.0A, night lights with line voltage screw based sockets are considered to be low efficacy luminaires. Overwhelmingly, market-available night lights that are integral to installed luminaires or exhaust fans incorporate screw based sockets (i.e., candelabra bases), and are therefore considered to be low efficacy. These night lights typically range from 0.5W – 4W of power draw and perform, in some cases, the essential function of safety lighting.

Currently, the 45 day language either bans low efficacy lighting entirely or requires that low efficacy lighting be controlled by a vacancy sensor or dimmer, depending on the room type. For example, low efficacy lighting in bathrooms must be controlled by a vacancy sensor (Section 150.0(k)5.B). Low efficacy lighting in garages, laundry rooms, and utility rooms is strictly prohibited (Section 150.0(k)6). Low efficacy lighting in rooms other than kitchens and those previously mentioned must be “controlled by either dimmers or vacancy sensors.”

Banning night lights from rooms can pose a safety hazard. Controlling a night light with a dimmer is beyond consideration, and using a vacancy sensor to control a night light can defeat its purpose of providing a safe path of access under low light conditions. For these reasons, an exception for night lights is warranted.

Additionally, Part 11 Appendix A4.2.1.C issues a de facto prohibition of indoor night lights for compliant, newly constructed low-rise residential buildings. For reasons of safety, an exception for night lights is warranted here as well.

Based on these factors, we would recommend the following changes to the 45 day language:

150(k)1.E. Night Lights. Permanently installed night lights and night lights integral to installed luminaires or exhaust fans shall be rated to consume no more than five watts of power per luminaire or exhaust fan as determined in accordance with Section 130.0(c). Night lights shall not be required to be controlled by vacancy sensors or dimmers.

150(k)6. Lighting in Garages, Laundry Rooms, and Utility Rooms. Lighting installed in bathrooms, attached and detached garages, laundry rooms, and utility rooms shall be high efficacy luminaires ~~or shall be controlled by either dimmers or vacancy sensors.~~

150(k)7. Lighting other than in Kitchens, Bathrooms, Garages, Laundry Rooms, and Utility Rooms. Lighting installed in rooms or areas other than in kitchens, bathrooms, garages, laundry rooms, and utility rooms shall be high efficacy luminaires, or shall be controlled by either dimmers or vacancy sensors. [NO CHANGE]

Part 11, Appendix A4 Division A4.2.1.C High efficacy indoor lighting. All permanently installed indoor lighting shall be high efficacy as defined in and controlled as required by Title 24, Part 6. Permanently installed lighting shall be installed in kitchens, bathrooms, utility rooms, and garages at a minimum. Every room which does not have permanently installed lighting shall have at least one switched receptacle installed;

Exception to A4.2.1.C: Low efficacy night lights in compliance with Title 24, Part 6 150(k)1.E are permitted.

Taken together, these proposed changes have the effect of ensuring that night lights of ≤ 5 W are permitted in any room within a house.

If you should have any questions, please feel free to contact me; thank you for your thoughtful consideration.

Sincerely,



Mike Moore, P.E.