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California Energy Commission  
Docket No. 12-BSTD-1  
Dockets Office  
1516 Ninth Street, MS-4  
Sacramento, CA 95814

<b>DOCKET</b>	
<b>12-BSTD-1</b>	
DATE	MAY 30 2012
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## Re: Comment for Docket 12 BSTD-1 Revisions to California Code of Regulations, Title 24, Part 1 and Part 6

I respectfully submit the following comment for the 15-day language for revisions to the California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 1 and Part 6.

### TABLE 130.1.-A Multi-Level Lighting Controls and Uniformity Requirements

#### Current Text:

Linear fluorescent and U-bent fluorescent >13 watts:

Minimum Steps: 20-40%, 50-70%, 80-85%, 100% percent of full rated power

Note 1. Full rated input power of ballast and lamp, corresponding to maximum ballast factor.

#### Comment:

The high level step of 100% seems to preclude the implementation of setting a high-end trim or of tuning the ballast to maximum value of something less than 100%.

#### Recommendation:

Define the "maximum ballast factor" to be the high-end trim or tuning value as defined in Section 100.1 Lighting Definitions.

Thank you for your consideration of this comment.

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President, RNM Engineering, Inc.