

DOCKETED

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Sahar Daemi, PhD
California Energy Commission
Docket Unit, MS-4
Docket No. 25-BSTD-03
715 P Street
Sacramento, California 95814

Submitted Electronically To: efiling.energy.ca.gov, docket number 25-BSTD-03

Re: 2028 Energy Code Pre-Rulemaking: Indoor Lighting Controls Final CASE Report

Dear Dr. Daemi:

The National Electrical Manufacturers Association (NEMA) represents over 300 electrical equipment manufacturers that make safe, reliable, and efficient products and technologies that power, connect, and light our world. Together, our members contribute a full 1% of U.S. GDP and directly provide over 590,000 American jobs, adding more than \$375 billion to the U.S. economy. Learn more at makeitelectric.org

NEMA's High Performance Buildings Codes and Standards Review Committee carefully reviewed the investor-owned utility Codes and Standards Enhancement (CASE) team's 17 June 2025 Proposal Summary for indoor lighting controls and developed detailed inputs for the team's consideration. The final CASE report informed by our subsequent dialog with the team has NEMA's full support, as it provides much-needed clarity on the trigger for continuous dimming requirements, specified in general lighting wattage, consistent with other mandatory lighting controls requirements. Code users will benefit from this alignment as they will no longer need to cross-reference multiple code sections to determine dimming requirements relevant to a given space. They will also benefit from the proposed clarifications regarding the use of manual dimmers including the proposed use of scene controllers to comply with manual dimming requirements. Finally, we believe building occupant satisfaction will improve as a result of the proposed alignments with industry best practices intended to avoid undesired and/or untimely lighting controls actions, including sudden OFF switching initiated by daylighting control signals.

As always, NEMA members appreciate the opportunity to review and comment on energy code proposals. Please reach out to alex.baker@nema.org if we can provide further information regarding our support for this effort.

Sincerely,

Alex Baker
Director, Regulatory & Industry Affairs