

Energy - Docket Optical System

From: Yasny, Ron@Energy
Sent: Wednesday, May 30, 2012 1:04 PM
To: Energy - Docket Optical System
Subject: FW: T-24 2013 15 Day Language Response
Attachments: M_IALD_T24 2013 15 Day Comment_12-0530.pdf

Please docket 12-BSTD-1

From: Michael Lindsey [mailto:MLindsey@HLBLIGHTING.COM]
Sent: Wednesday, May 30, 2012 12:10 PM
To: Yasny, Ron@Energy
Cc: Flamm, Gary@Energy
Subject: T-24 2013 15 Day Language Response

DOCKET	
12-BSTD-1	
DATE	<u>MAY 30 2012</u>
RECD.	<u>MAY 31 2012</u>

California Energy Commission,

Attached please find comments in reference to the 15 Day proposed language revisions related to lighting within Title 24.

As requested, I have included our comments in PDF format for tomorrow's hearing. I unfortunately cannot attend but the IALD will be represented by John Martin who can speak to our involvement thus far and our general approach toward energy code legislation moving forward.

I am pleased to say that after reviewing much of the proposed language for the 2013 Code, your team has already implemented many of our desired approaches and comments, however, there are some additional thoughts for future consideration.

Please review and feel free to contact me directly should you have any questions or require any further information.

Thanks,

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**Please note our office hours are 9:00 AM to 6:00 PM Monday through Thursday, and 9:00 AM to 1:00 PM on Fridays.*

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Memorandum

To: California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Date: 30 May 2012

From: Michael Lindsey
IALD Representative

Pages: 3

cc:

Project: 2013 Building Energy Efficiency Standards
15 Day Language Review
T24 Part 6

Sent via: Email

Regarding: T-24 2013 Building Energy Efficiency Standards – Part 6 15 Day Language Review

Comments:

Dear California Energy Commission,

On behalf of the IALD Energy & Sustainability Committee, I'm pleased to submit the following comments regarding the 15 day lighting language for consideration in the upcoming 2013 California Building Energy Efficiency Standards.

Please review the items listed below noting that recommended revisions or additions to the code are indicated within the language as **BOLD** and items recommended for removal are indicated as ~~strike through~~. Other items are simply listed as comments for consideration that we would like your team to be aware of as you finalize the language of the code.

<i>Determination of Outdoor Lighting Zones and Administrative Rules for Use</i>		
Location:	Language:	Proposed Language Revision
Section 10-114	N/A	(a) Lighting Zones. Exterior lighting allowances in California vary by Lighting Zones (LZ). Lighting Zones can be determined utilizing the U.S. 2000 Census Map.

Comments:

We often find that people have questions regarding how to determine a lighting zone for a specific project and don't know where to look. We recommend including direction, similar to the above, to better direct parties to where they can find this information.

As this information is touched on in Table 10-114-A, perhaps a more definitive map location could be provided within the language.

<i>All Mandatory Lighting</i>		
Location:	Language:	Proposed Language Revision
Section 110.9	(f) 2. Have a ballast factor of not less than 0.90 for non-dimming ballasts and a ballast factor of not less than 0.85 for dimming ballasts.	N/A

Comments:

Currently the lamp/ballast manufacturers have made great strides in developing lamp/ballast systems that deliver the same light output as previous 1.0 BF ballasts utilizing a 0.71 BF ballast (reference Osram Sylvania Xtreme lamp/ballast system).

For a single 4' T8 lamp system, the energy usage is reduce to 25W instead of the normal 32W while the delivered light is the same.

We are concerned that requiring a 0.90 BF eliminates the ability for us to achieve more energy savings utilizing this low ballast factor ballast.

<i>Lighting Controls & Equipment</i>		
Location:	Language:	Proposed Language Revision
Section 130.0 (c), 6., B	The wattage of a compact fluorescent or high intensity discharge luminaire that can accommodate a range of wattages without changing the luminaire housing, ballast, or wiring shall be the larger of:	The wattage of a compact fluorescent or high intensity discharge luminaire that can accommodate a range of wattages without changing the luminaire housing, ballast, or wiring shall be the larger of: as noted on a permanent, pre-printed, factory installed label, as specified by UL 1598. If label is not present, it shall be the average wattage of all of the lamp/ballast combinations for which the luminaire is rated.

Comments:

It appears the language in this section was completely removed and we would strongly advocate for it's return.

As designers, we look to specify lower wattage lamps that are associated with multiple level ballasts (i.e. 26W CFL that is powered by 26/32/42W ballast) and want to properly account for the amount of wattage being consumed.

The above revision is meant to support the use of wattage restriction labels as a valuable tool for designers. My experience has shown that maintenance staffs focus on the currently installed lamp and wattage restriction labels when maintaining fixtures. This more clearly indicates what the fixture is designed for.

If a permanent wattage restriction label is not present, then accounting for the average of all lamp/ballast combinations is appropriate.

30 May 2012

Page 3 of 3

Thank you again for allowing us the opportunity to be involved and comment on the hard work that your team has put in thus far in furthering the Title 24 2013 code language.

Overall we have found that our voice has been heard and welcomed throughout the process and, while perhaps not all of our comments have been incorporated at this time, we are confident that they have been considered and will continue to be well received moving forward with future code development.

With the continued and active involvement of organizations, like ourselves, we can continue to work as partners in influencing energy legislation in a positive manner.

Feel free to contact me directly should you have any questions regarding the submitted comments.

Regards,

A handwritten signature in black ink that reads "Michael Lindsey". The signature is written in a cursive, flowing style.

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