

DOCKETED

12-BSTD-01

TN # 67651

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Saxton, Patrick@Energy

From: Saxton, Patrick@Energy
Sent: Tuesday, October 09, 2012 4:18 PM
To: 'Mjouaneh@lutron.com'
Subject: Staff Response to Lutron Electronics Co Incs Comments TN-67373
Attachments: Staff Response to Lutron Electronics Co Incs Comments TN-67373.pdf

Hello Mr. Jouaneh,

Thank you for comments. Please find attached the staff response to your comments sent to docket # 12-BSTD-1 regarding revisions to California Code of Regulations, Title 24, Part 11 (CALGreen).

Sincerely,

Patrick Saxton
California Energy Commission
916-651-0489

Hello Mr. Jouaneh,

Thank you for comments. Please find below the response to your comments sent to docket # 12-BSTD-1 regarding revisions to California Code of Regulations, Title 24, Part 11 (CALGreen).

1. During the development of the 2013 Building Energy Efficiency Standards (Title 24, Part 6), it was determined that a requirement for all permanently installed lighting in low-rise residential buildings to be high efficacy was cost effective.¹ Although, the adopted 2013 Building Energy Efficiency Standards did not ultimately include a proposal that all permanently installed lighting in low-rise residential buildings be high efficacy, similarly stated voluntary provisions are befitting for the proposed 2013 Energy Provisions of CALGreen (Title 24, Part 11).

CALGreen was initially developed and adopted in response to policy directives from the Governor, founded on statutory directives to address climate change.² The proposed 2013 Energy Provisions of CALGreen are voluntary and are meant to achieve exemplary levels of energy efficiency in order to support the goals of CALGreen. Although, there may be limited applications for which it is less straightforward to identify high efficacy sources for certain lighting types, there would be no issue with meeting a requirement for all permanently installed lighting to be high efficacy for the vast majority of low-rise residential buildings. Due to the voluntary nature of these provisions, the fact that any local jurisdiction wishing to adopt these voluntary provisions as requirements via local ordinance is required to do so at a public meeting³, and the fact that any proposed local ordinance must be submitted to the Energy Commission for approval⁴, the Energy Commission believes that the proposed 2013 Energy Provisions of CALGreen are appropriate to meet the objectives and purposes of CALGreen and other supporting California energy policies.

2. The low-rise residential lighting control provisions in the proposed 2013 Energy Provisions of CALGreen would be in addition to any applicable lighting control requirements in Section 150.0(k) of the 2013 Building Energy Efficiency Standards (Title 24, Part 6). Therefore, under the proposed 2013 Energy Provisions of CALGreen, vacancy sensors would still be required for garages and utility rooms due to Section 150.0(k) and additionally there would be voluntary provisions for requiring vacancy sensors in bathrooms, with an exception for one high efficacy luminaire with total lamp wattage rated to consume no greater than 26 watts of power.

Sincerely,

Patrick Saxton
California Energy Commission
916-651-0489

¹ See Codes and Standards Enhancement Initiative (CASE) Residential Lighting, October 2011, available at: http://www.energy.ca.gov/title24/2013standards/green_building/documents/documents_relied_on/2013_CASE_R_Residential_Lighting_Oct_2011.pdf.

² See CALGreen, The 2010 California Green Building Standards Code Are you ready?, pp. 2-3, available at: <http://www.documents.dgs.ca.gov/bsc/CALGreen/The-CALGreen-Story.pdf>.

³ Public Resources Code § 25402.1, subd. (h)(2); Cal. Code Regs., tit. 24, part 6, § 10-106.

⁴ Ibid.