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[CEA] for Multilevel Lighting Controls on the Indoor Lighting Controls CASE Report

Thank you.

Additional submitted attachment is included below.



To: California Energy Commission

From: California Energy Alliance (CEA)

Date: July 17th, 2026

Subject: [CEA] for Multilevel Lighting Controls on the *Indoor Lighting Controls CASE Report*

To Commissioner McAllister and the CEC's Build Energy Efficiency Standards Team,

The California Energy Alliance (CEA) is responding to the recently published Indoor Lighting Controls Final CASE Report¹. The Member-Partners of CEA are encouraged to see collaborative concepts on Multilevel Lighting Controls be integrated into the CASE Report.

The CEA validates the critical findings detailed in the June 2026 Final CASE Report, which projects that updating the multilevel lighting controls framework will capture 4.8 GWh in first-year statewide electricity savings and secure \$38.8 Million in 30-year lifecycle Long-Term System Cost (LSC) savings for California².

CEA is submitting the following comments to support the path forward on *Section 5. Update Multilevel Lighting Controls Requirements*:

1. The proposed language clarifies regulatory language to explicitly mandate the installation and use of multilevel lighting controls such as manual dimming or scene control rather than merely requiring that luminaires possess latent multilevel capability.
2. The proposed change expands energy-savings for California. The report increases the energy efficiency of California's Energy Code, Title 24, Part 6, by making energy-saving controls required in a broader range of spaces.

¹ Docket: 25-BSTD-03 Project Title: 2028 Energy Code Pre-Rulemaking. TN# 270767, Indoor Lighting Controls Final CASE Report

² California Statewide Codes and Standards Enhancement (CASE) Team, *Indoor Lighting Controls Final CASE Report*, California Energy Commission, Docket No. 25-BSTD-03, TN #270767 (June 2026), pp. 10, 189.



3. The proposed language³ simplifies the energy code's structural layout by removing the section for multilevel lighting controls and embedding the simplified requirement into manual controls where it makes the most sense, since multilevel lighting controls are manual lighting controls that let occupants select different light levels (in addition to ON and OFF) based on the tasks at hand.
4. The proposed language aligns with Title 24 Part 6 with 90.1 and IECC which both have spaces where dimmers are required.

In consideration of AB 130, CEA is raising the following points with regards to the implementation of the Multilevel Lighting Controls into mixed-use and hospitality spaces:

5. CEA highlights that shifting to a simplified manual dimming framework reduces installer confusion, streamlines field compliance, guarantees cost-effective lifecycle savings ranging from \$0.62 to \$3.21 per watt controlled depending on the space type.⁴
6. CEA recommends that shifting from complex "multilevel capability" text to simplified, native manual dimming minimizes implementation confusion for designers and installers in these sectors.

In addition, CEA is raising concerns that Californians could be saving more energy:

7. Data from market actors show that roughly two-thirds (66%) of all commercial lighting alteration projects are currently exempt from having to install multilevel lighting controls.
8. Because alterations make up the majority of construction projects in the state, leaving building alterations unacknowledged on the final report means that a substantial, practical, and scalable opportunity for energy savings in California is overlooked.
9. While it may be difficult to include building alterations as a critical component of the final case report because of timing, the CEA would like to see it integrated into the next code cycle.

³ This language aligns California's Title 24, Part 6 with national standards like ASHRAE 90.1 and the IECC.

⁴ TN #270767 (June 2026), sec. 5.4.2.2, pp. 147–154.



Therefore, CEA notes and recommends points (10) through (12) for the Alterations Market on a future CASE report:

10. CEA strongly recommends removing the multilevel lighting control exception for substantial building alterations (projects involving rewiring and new fixtures).
11. CEA recommends changing the code language in the alterations table from 'Not Required' to 'Required' for any renovation project that is currently exempt under that 80% LPD exception.
12. Capturing building alterations in the report represents an accessible opportunity to maximize energy savings for California. Modern multilevel controls are cost-effective, commercially mature, and wireless which makes them straightforward to integrate into building renovations.

CEA represents California's diverse energy stakeholders. CEA would like to thank the CEC for engaging with the CEA on Codes & Standards and the CASE Team for acknowledging CEA's contributions to the Indoor Lighting Controls CASE report:

13. Recognizing CEA as the original proposer of the concept to revise the current threshold triggering California's multilevel lighting controls requirements⁵.
14. Member-Partners of the CEA have been engaged in the rulemaking process by both the CASE Team and the CEC's Build Energy Efficiency Standards Team. CEA provided ongoing technical and collaborative support on the specific measure language and commentary to its developments⁶.

⁵ TN #270767 (June 2026), sec. 1.2, p. 1, 129.

⁶ TN #270767 (June 2026), Appendix E, Table 123, p. 253.



The California Energy Alliance looks forward to continued collaborative engagement on existing and future measures involving the evolution of Title 24, Part 6.

Sincerely,



California Energy Alliance

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