

TO: California Energy Commission Docket No. 12-BSTD-01  
[Docket@energy.ca.gov](mailto:Docket@energy.ca.gov)

FROM: Michael Jouaneh, Lutron Electronics Co., Inc.

DATE: September 28, 2012

RE: **Lutron Electronics Co., Inc. Comments for Docket 12 BSTD-01 Revisions to California Code of Regulations, Title 24, Part 11 (CALGreen)**

Lutron Electronics Co., Inc. respectfully submits the following comments for the 15-day language for revisions to the California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 11 (CALGreen).

**Section A4.203.1.1.3 Lighting.**

**Current Text:**

Comply with all applicable requirements of Title 24, Part 6 Section 150.0(k). In addition:

1. All permanently installed lighting shall be high efficacy. Permanently installed lighting shall be installed in kitchens, bathrooms, utility rooms, and private garages at a minimum.

**Exceptions:**

1. Night lights which comply with Title 24, Part 6 Section 150.0(k)1E.

2. Lighting integral to exhaust fans which comply with Title 24, Part 6 Section 150.0(k)1F.

2. All permanently installed lighting in bathrooms shall be controlled by a vacancy sensor.

**Lutron Comments:**

1. Some non-high efficacy lighting in kitchens should be allowed especially for cabinet lighting as there usually are no high efficacy sources for that type of lighting. We proposal to keep the exception in Title 24 Part 6 2013 to allow for a little non-high efficacy lighting: "Up to 50 watts for dwelling units less than or equal to 2,500 ft<sup>2</sup> or 100 watts for dwelling units larger than 2,500 ft<sup>2</sup> may be exempt from the 100 percent high efficacy requirement when all permanent lighting in the kitchen is controlled by vacancy sensors or dimmers."
2. Some of these changes in Title 24 Part 11 are less stringent than what will be in Title 24 Part 6 2013. In Title 24 Part 6 2013, lighting in garages and utility rooms are required to be high efficacy and be controlled by a vacancy sensor. Vacancy sensors should be required for garages and utility rooms as they are in Title 24 Part 6 2013.

Thank you for your consideration of these comments.

Respectfully submitted,



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