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Vice President, Government Relations

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Submitted via email: docket@energy.ca.gov

Ms. Karen Douglas
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Mr. Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

NEMA Letter in Support of Revised Effective Date for the 2013 California Building Energy Efficiency Standards

Dear Commissioners Douglas and McAllister,

The National Electrical Manufacturers Association (NEMA) appreciates the opportunity to comment in favor of the proposed extension of the effective date of the Title 24 Building Energy Efficiency Standards.

As you may know, NEMA is the association of electrical equipment manufacturers, founded in 1926 and headquartered in Arlington, Virginia. Its member companies manufacture a diverse set of products including power transmission and distribution equipment, lighting systems, factory automation and control systems, and medical diagnostic imaging systems. Worldwide annual sales of NEMA-scope products exceed \$120 billion. These comments are submitted on behalf of NEMA member companies from multiple product areas.

We support the extension because it will afford the additional time needed to establish, revise and roll out the necessary clarifications to requirements and compliance manuals, establish the additional educational materials for designers and builders, and complete the modification to other tools such as certification and reporting databases – all of which are critical to establishing a firm footing as the new code is implemented. Modifying the effective date to allow for the completion of these steps will help avoid a negative backlash to high efficiency technologies and allow for easier implementation of and adherence to regulations.

Thank you for your consideration of these concerns. In your reply to these matters and for any questions regarding these issues, please contact Alex Boesenberg of NEMA at 703-841-3268 or alex.boesenberg@nema.org.

Sincerely,

Kyle Pitsor
Vice President, Government Relations