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[CEA] Support for Manual Dimming Controls

See attached. Thank you.

Additional submitted attachment is included below.

To: **California Energy Commission**

From: **California Energy Alliance (CEA)**

Date: November 5th, 2026

Subject: **[CEA] Support for Manual Dimming Controls**

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

The California Energy Alliance (CEA) is responding to support the Pre-Rulemaking Draft Regulatory Text for the 2028 Energy Code[1]. The Member-Partners of CEA are encouraged to see the collaborative concepts on Multilevel Lighting Controls be integrated into the CASE Report and express continued support for the newly added section on **601.2.2.1.4 [New section] Manual dimming controls**.

While it may be difficult to include changes to building alterations in the Pre-Rulemaking Draft Regulatory Text for the 2028 Energy Code because of timing, CEA would like to see it integrated into the next code cycle. For the 2031 Energy Code, CEA would like to remind the CEC and the Statewide CASE teams about integrating this new section to apply building alterations. To assist in this thinking, CEA is providing the notes below so that California's built environment could save more energy:

1. 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.

2. 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.

[1] Docket: 25-BSTD-03 Project Title: 2028 Energy Code Pre-Rulemaking. TN# 273088

Therefore, CEA notes and recommends points (3) through (5) for the Alterations Market on a future CASE report, specifically in 2031.

3. CEA recommends removing the multilevel lighting control exception for substantial building alterations (projects involving rewiring and new fixtures).

4. 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.

5. 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.

In addition, with regards to the 2028 and future code cycles, the naming convention of “Manual Controls” can be more accurate and be properly named “Manual Area Controls.” It would even be better, if the title of the specific sections referenced like for example, Manual Dimming Controls, is 601.2.2.1.4 (which is under Manual Controls 601.2.2.1):

CONTROL SPECIFICATIONS	CODED SECTION	PROJECTS COMPLYING WITH SECTION 601.5.2.2.4 ITEM 1	PROJECTS COMPLYING WITH 601.5.2.2.4. ITEM 2 3. OR ~~4~~
Manual Area Controls	601.2.2.1.1 *[130.1(a)1]*	Required	Required
Manual Area Controls	601.2.2.1.2 *[130.1(a)2]*	Required	Required
Manual Area Controls	601.2.2.1.3 *[130.1(a)3]*	Only required for new or completely replaced circuits	Only required for new or completely replaced circuits
Manual Area Controls	601.2.2.1.4 *[New section]*	Required	Not Required

The CEA in collaboration with the Statewide CASE team helped develop this new section and the CEA would like to thank the team and the CEC for their continued work on Title 24, Part 6.

CEA is 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 as the original proposer of the concept of revising the current threshold triggering California's multilevel lighting controls requirements[2].

CEA looks forward to a continued collaborative engagement on existing and future measures involving the evolution of Title 24, Part 6.

Sincerely,



California Energy Alliance

caenergyalliance.org

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[2] TN #270767 (June 2026), sec. 1.2, p. 1, 129.