

DOCKETED

Docket Number:	17-BSTD-01
Project Title:	2019 Building Energy Efficiency Standards PreRulemaking
TN #:	219976
Document Title:	Darrell Craig Mays Comments: On 2019 Non Residential Lighting Changes
Description:	N/A
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On 2019 Non Residential Lighting Changes

Docketed incorrectly in 16-BSTD-02.

Additional submitted attachment is included below.

DOCKETED

Docket Number:	16-BSTD-02
Project Title:	2016 Nonresidential Lighting Alteration Enforcement
TN #:	219962
Document Title:	Darrell Craig Mays Comments 2019 Non Residential Lighting changes
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2019 Non Residential Lighting changes

Hello

As a registered PE in the State of CA and as someone frequently involved in the energy industry, I take exception to the proposed changes in this docket. There are no proposed cost benefit ratio's presented that provide any economic reason to make the changes. Especially in the area of existing structures that are doing simple lighting retrofits from fluorescent technology to LED technology, this proposal would seem to make those changes nearly impossible to perform for almost every owner of an existing building in the State.

It would dramatically limit the Proposition 39 work for schools as it would appear to drive the SIR calculation for that work far below 1. Please consider NOT changing the rules around Option 3. I strongly believe the impact of the rule change would force more owners of buildings to do nothing rather than continue migrating to much more efficient LED technology.

thank you

Darrell Craig Mays, PE