

DOCKETED

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Comments to CEC

Additional submitted attachment is included below.

7/14/2017

California Energy Commission
Docket No. 17-BTSD-01
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 17-BTSD-01 – Non-Residential Lighting Measures for 2019 Standards

As a contractor who does lighting retrofits in California, the Title 24 Energy Standards have a major impact on our work and our business. Over the years, the code has become difficult to implement in lighting projects. Our company, Statewide Labor Management Cooperation Committee, has looked at the two recent code change proposals on lighting alterations for 2019. We very much prefer the proposal and recommendations by the Alliance of Energy stakeholders. Their proposal would simplify the 2019 code lighting alterations requirements. If the Alliance proposal is adopted, our lighting retrofit work would be considerably easier and we believe that code compliance would be much greater.

One point in the Alliance proposal that is needed is the inclusion of the term one-for-one. It is a term that is commonly used in our industry. While we have an understanding of it, not everyone has the same understanding. It needs a clear definition to be helpful and effective.

For our lighting retrofit work, the current 2016 code path of 50/35% more efficient lighting is not producing the needed results. 50/35% is reducing potential energy savings, and leaving out ADR capable devices. This is a major concern because we don't see how the intelligent grid can talk to a facility without controls that can receive grid transmitted signals.

Most importantly, our company supports limiting the use of the 50/35% option by building size. After looking through the two proposals that the CEC is considering, the 5000 sq. ft. limit makes much more sense. According to the report by the Alliance group, raising the threshold to 10,000 sq. ft. or higher would allow roughly 70 percent of California buildings to continue using this approach to compliance – that's way too many. Existing buildings really need to upgrade to more efficient technology and use ADR capable lighting controls. We feel that having no limit, or a larger than 5,000 sq. ft. building size limit, on the 50/35% would seriously harm our ability to save energy on retrofits.

Most lighting system retrofits are done when a new owner or tenant takes over a building. These types of tenant renovations should not be using the 50/35% compliance approach as the code stands today. There are many reasons why 50/35% is not working in the 2016 code; one of those is confusion. Title 24 compliance manuals put all the compliance options in one table as though they are roughly the same. The addition of a clearly defined limit of 5000 sq. ft. would remove ambiguity. To be clear about our position, when we say 5,000 sq. ft. we are referring to the size of the building, not a space in a larger building.

Finally, based on what is really going on in the field with lighting retrofits, our company has a major concern over the enforcement of the current 2016 code and some proposals for the 2019 code. The state should not be confident that expected energy savings will be realized when there is no inspection to verify original baseline lighting. For 2019, there is one code proposal that recommends a 50% more efficient lamp standard, and does not include a building size limit. We do not see any reason why more energy would be saved versus the current 35% pathway because there is no verifiable method of ensuring that the original lighting level qualified for that option.

In general, our company believes that owner and tenant renovations need to follow compliance standards that are utilized for new construction and we do not agree with the 50/35% approach or an all-inclusive 50% pathway. However, if the CEC is decides to continue using this approach it should absolutely be limited to 5,000 sq. ft. buildings.

These issues are very important to our company's lighting retrofit work. Thank you for considering our comments.

Best Regards,
Christopher D. Smith
Statewide Labor Management Cooperation Committee