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Additional submitted attachment is included below.

PHILIPS

July 14, 2017

Submitted via website: https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=17-BSTD-01

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

Docket No.: 17-BSTD-01

Philips Lighting Comments on the Draft CASE Report (June 2017) Advanced Daylighting Design for the 2019 California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 6

Dear Commissioner McAllister,

Philips Lighting appreciates the opportunity to provide the attached comments on the Draft CASE Reports of June 2017 for the Nonresidential Lighting provisions of the 2019 California Building Energy Efficiency Standards California Code of Regulations, Title 24, Part 6. We also send our thanks to the California Energy Commission and recognize the CEC's efforts as well as that of the CA IOUs and consultants to involve industry in the development of the CASE Reports.

Philips Lighting is a global leader in lighting products, systems and services. Our understanding of how lighting positively affects people coupled with our deep technological know-how enable us to deliver digital lighting innovations that unlock new business value, deliver rich user experiences and help to improve lives. Serving professional and consumer markets, we sell more energy efficient LED lighting than any other company. We lead the industry in connected lighting systems and services, leveraging the Internet of Things to take light beyond illumination and transform homes, buildings, and urban spaces.

Please contact me if you have any questions about these comments.

Sincerely,

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Philips Lighting Comments on the Draft CASE Report (June 2017) Advanced Daylighting Design for the 2019 California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 6

We applaud the efforts of the CEC and the CASE Team to address issues and improve the daylighting requirements in the code. We support code change Proposal A that puts forward the inclusion of a Power Adjustment Factor for indoor lighting controlled by daylight control when fixed slats, tubular daylighting devices (TDD), or clerestory windows are installed in the building.

We also applaud the efforts to add clarifying definitions to Section 100.1 and improve the language in Sections 110.6(a)4 and 130.1(d).

We do not support the proposed definition of 'clerestory' and suggest the following changes to the proposed definition and to the subsequent code sections where the term is used. Simply put, a clerestory is a fenestrated wall, originally, a wall of a space that was carried higher than the surrounding roofs in order to light the interior of the space. This architectural term is widely known and used and has much historical and architectural significance and as such, the Building Energy Efficiency Standards should use the term correctly.

We propose the use of "clerestory window" to make clear to users of the code that the Building Energy Efficiency Standards are concerned with the fenestration part of the clerestory not the clerestory itself, i.e. the wall. We recommend that the language in the new sections proposed for compliance documents NRCC-ENV-05 and NRCA-ENV-02-F also reflect the correct definition and usage of clerestory for clarity and consistency across all documents.

100.1:

CLERESTORY WINDOW is any portion of vertical fenestration ~~area~~ of an outside wall greater than eight feet above the finished floor of a space.

LIGHT SHELF is a contiguous opaque surface located at the sill of a clerestory window, oriented horizontally and projecting horizontally from an exterior vertical surface either towards the exterior or towards the interior of a space.

LIGHT SHELF DROP is the vertical distance between the front edge of a light shelf and the head of the clerestory window onto which it is mounted.

140.3(d)4:

4. Interior or exterior Light Shelves

A. Shall meet the requirements of Section 140.3(d)2.

B. If there is vertical fenestration area below the light shelf that fenestration area shall have an overhang. The overhang shall meet the requirements of Sections 140.3(d)2.A, 140.3(d)2.B and 140.3(d)2.D.

C. If operated shading is installed on the clerestory window, then the clerestory window shading shall be controlled separately from shading serving other vertical fenestration.

5. Clerestory~~ies~~ Windows

A. Shall have a head height that is at least 10 feet above the finished floor.

B. Shall have a glazing height that is greater than or equal to 10 percent of the head height.

C. If operated shading is installed on the clerestory window, then the clerestory window shading shall be controlled separately from shading serving other vertical fenestration.

6. Daylight Redirecting Devices

A. Shall be mounted on a clerestory which meets the requirements of Section 140.3(d)5. The clerestory window onto which the daylight redirecting device is mounted shall have a VT greater than or equal to 0.50.

B. Shall be permanently mounted less than or equal to one foot below a finished ceiling.

Thank you for your consideration of Philips Lighting Comments on the Draft CASE Report (June 2017) Advanced Daylighting Design for the 2019 California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 6.