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CALSEIA's Comments on ADR in Non-Residential Lighting Measures for 2019 Standards

Additional submitted attachment is included below.

July 27, 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

Dear Commissioners:

The following comments represent the views of California Solar Energy Industries Association (CALSEIA) on the important energy code issue of automated demand-response (ADR) capability in non-residential buildings.

CALSEIA is a trade association of 450 businesses involved in the solar industry in California, including installers, manufacturers, financiers, consultants, and others. We represent companies on policy matters and assist with common business development opportunities. As noted in earlier comments, CALSEIA is engaged in the 2019 codes cycle on lighting efficiency issues because ADR is an important tool to help California meet its ambitious clean energy and clean air goals.

To improve non-residential lighting standards under Title 24 for 2019, we urge the Commission to adopt proposals that will mandate installation of equipment in non-residential buildings and spaces over 10,000 square feet in area (regardless of lighting power allowance in the space) that can receive and respond to ADR signals. California utilities use OpenADR 2.0a or later; some lighting equipment uses these protocols and some may use BACnet. Therefore, we believe the requirement should be for a gateway that receives an OpenADR signal or can communicate with either OpenADR or premises equipment using BACnet (or another appropriate protocols). After receiving the signal, the lighting power should be changed from the then current lighting power consumption. That is, if the lights are already at 85% of total installed power, they should be further reduced. The total percentage change would be negotiated between utilities and their customers. We note that future ADR events may require a temporary increase in power consumption in order to balance grid loads.

The ADR controls should include at least 75% of the building's installed lighting power, to allow for minor non-controlled areas such as closets, storerooms and utility areas. We believe this important goal can be achieved in an economical and straightforward manner using equipment that is accessory to the lighting system.

We also recommend that the Commission adopt language extending similar ADR capability and load reduction levels to a minimum of 75% of a building's exterior lighting load (e.g., parking

areas, facades, and path lighting).

Incorporating these recommendations in the 2019 version of Title 24 will correct an inadvertent oversight in the 2016 code, which requires ADR capability but does not require installation of ADR receiving equipment useful to utilities and grid operators.

CALSEIA greatly appreciates the Commission's consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Kelly Knutsen".

Kelly Knutsen, Ph.D.
Senior Policy Advisor, CALSEIA

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