

## DOCKETED

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*Comment Received From: Cori Jackson*

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**2019 Building Energy Efficiency Standards PreRulemaking, Section 130.1(c)1**

*Additional submitted attachment is included below.*



October 20, 2017

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Re. Docket 17-BSTD-01  
2019 Building Energy Efficiency Standards PreRulemaking, Section 130.1(c)1

At the California Energy Commission meeting on June 22, 2017, a utility sponsored code change proposal was presented showing that significant energy could be saved by mandating some indoor spaces use a Manual-ON control strategy as compared to an Automatic-ON scheduling system. Because of that report, the CEA is surprised that a Manual-ON control strategy is not mandated for any specific indoor spaces. To our knowledge, no scheduling system other than the simplest timeclocks lack the ability to do Manual-ON as part of its programmed schedule.

The current draft 2019 Standards only require that automatic shut-OFF controls installed to achieve compliance with Section 130.1(c)1 include *“the ability to operate in manual-ON mode.”* Unfortunately, many owners will set their systems to Auto-ON and waste possible energy savings, especially if holiday dates are not entered into the system. Without explicit requirements within the Energy Standards for use of a manual-ON control strategy where scheduling controls exist, savings from use of the simple strategy will be lost.

The CEA recommends that the Energy Commission reconsider the value of mandating a Manual-ON control strategy for certain spaces in facilities that use a scheduling system to meet the Automatic Shut-OFF Controls requirements contained in Section 130.1(c).

Sincerely,

A handwritten signature in blue ink that reads 'Cori Jackson'. The signature is fluid and cursive, with the first name 'Cori' being more prominent.

Cori Jackson  
Executive Board Member  
California Energy Alliance