

DOCKETED

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In Support of CASE Team Topics Docketed 11-6-17

Additional submitted attachment is included below.

November 13, 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 – Comments in Support of CASE Team Topics, Docketed 11/6/17

Legrand, especially its California based Wattstopper lighting control brand, appreciates the opportunity to submit comments to the Title 24 Standard's process. We acknowledge the significant work put forward by all proposal teams, commission staff, commission consultants and other contributors to improve the energy efficiency and applicability of the Title 24 lighting and lighting control related sections.

With our many years of experience in the lighting controls industry, Legrand submits our remarks in support of comments put forward by the Statewide Utility Codes and Standards Team Comments on Lighting Topics, docketed on November 6, 2017.

Outdoor Lighting Controls – SECTION 130.2

As submitted in our comment letter, docketed October 20, 2017, the 2019 Express Terms created substantive changes to the outdoor lighting control energy efficiency requirements by:

- 1) Removal of the mandatory requirement for occupancy sensors on fixtures less than 24 feet, as well as other related provisions of lighting control
- 2) Elimination of the line "All installed outdoor lighting shall be independently controlled from other electrical loads by automatic scheduling controls"

In many respects, this would be a significant roll back to earlier Title 24 outdoor lighting efficiency requirements, and would result in an increase to outdoor lighting energy use over the 2016 Title 24 Standard.

We submit our support to the Outdoor Lighting Controls (section 3) proposed language docketed on November 6, 2017 by the California Statewide Utility Codes and Standards Team. This proposed language delivers flexibility to design practitioners in applying outdoor lighting controls and emphasizes good practice by reducing lighting energy use during vacant hours, when full lighting output is not warranted. The proposed requirements can be easily applied by control products that have been available and saving energy in the outdoor lighting environment for many years. The noted benefit-to-cost ratio presented in the CASE team submission is significant, and results in substantial energy savings statewide that should not be lost without providing the proposed or suitably similar outdoor lighting control requirements.

We would urge the Energy Commission to not roll back energy efficiency and support the recommendations for outdoor lighting controls put forward by the Statewide Utility Codes and Standards Team.

Legrand appreciates the opportunity to be part of the open energy efficiency standards development process and invites further dialogue where we can participate in achieving California's energy efficiency goals together.

Best Regards,

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