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<th><strong>Docket Number:</strong></th>
<th>17-BSTD-01</th>
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<td><strong>Project Title:</strong></td>
<td>2019 Building Energy Efficiency Standards PreRulemaking</td>
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<td><strong>Document Title:</strong></td>
<td>Philips Lighting Comments in Support of CASE Team Proposed Language for Outdoor Lighting Controls</td>
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<td><strong>Description:</strong></td>
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<td><strong>Organization:</strong></td>
<td>Philips/Kelly Seeger</td>
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<td><strong>Submitter Role:</strong></td>
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Philips Lighting Comments in Support of CASE Team Proposed Language for Outdoor Lighting Controls

Additional submitted attachment is included below.
November 17, 2017


Mr. Payam Bozorgchami
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Docket No.: 17BSTD-01

**Philips Lighting Comments in Support of CASE Team Docketed Comments on Outdoor Lighting Controls Language for the 2019 California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 6**

Dear Mr. Bozorgchami,

Philips Lighting appreciates the opportunity to provide the attached comments for the 2019 California Building Energy Efficiency Standards California Code of Regulations, Title 24, Part 6.

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,

[Signature]

Kelly M. Seeger, MSc, LC, IES, LEED AP
Technical Policy Manager, Building Codes & Standards
Standards and Regulations Americas
Philips Lighting
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Philips Lighting Comments in Support of CASE Team Docketed Comments on Outdoor Lighting Controls Language for the 2019 California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 6

We thank the Energy Commission and the Statewide Utility Codes & Standards Team for improving the way of working with industry during the 2019 code cycle. We sincerely appreciate the willingness of Staff and CASE Team contributors to dialogue on comments, address concerns, and work through proposals.

**Section 130.2 - Outdoor Lighting Controls and Equipment**

130.2(c) Controls for Outdoor Lighting

We submit our support for the Outdoor Lighting Controls proposed language docketed on November 6, 2017 by the California Statewide Utility Codes and Standards Team.

We believe these recommendations are cost-effective, feasible, and will help California achieve its energy and environmental goals. The proposed requirements are straightforward and improve the usability of the outdoor controls section of the code. The control strategies - bi-level motion sensing, timed overrides, and default scheduling, encourage energy efficiency improvements and innovation within the outdoor space. Savings after hours will increase even though full light output from the luminaires will be provided when people are moving about in the outdoor area. We also appreciate the alignment of the default schedules proposed to ASHRAE 90.1.

We urge the Energy Commission to adopt the proposed language by the Statewide Utility Codes & Standards Team into the 45-day language for the 2019 California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 6.

Thank you for your consideration of Philips Lighting Comments.