

DOCKETED

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NRDC Letter to CEC Staff Regarding Several Lighting Topics for 2019 Title 24

Additional submitted attachment is included below.



NRDC Letter to CEC Staff Regarding Several Lighting Topics for 2019 Title 24

December 8, 2017

The Natural Resources Defense Council (NRDC) appreciates the opportunity to provide feedback on the California Energy Commission (CEC)'s 2019 update to the Building Energy Efficiency Standards. The 2019 Standards aim to achieve zero net energy (ZNE)-ready new construction residential buildings in 2020, in line with California's goal of ZNE for residential buildings in that year.

NRDC is aware of several issues related to lighting that emerged in the Express Terms and the proposal for updates to CALGreen. We have a lengthy history advocating for good environmental and consumer outcomes based on energy savings from lighting improvements. These measures have focused on efficacy requirements and control methods to directly reduce energy consumption while maintaining satisfactory illumination. Factors not pertaining directly to lighting fixture energy consumption, however, are also increasingly important to ensuring successful adoption of energy efficient lighting. These factors include correlated color temperature, dimmability, flicker, simplicity in compliance and enforceability, and more.

NRDC has reviewed two letters submitted to the docket by the statewide Codes and Standards Enhancement (CASE) team, sponsored by the California Investor-Owned Utilities (IOUs). These letters address issues pertaining to lighting in the 2019 Title 24 update, regarding both CALGreen and the Part 6 Express Terms.^{1,2} We request that CEC carefully evaluate and address the concerns expressed in those letters as it works to finalize the 2019 Building Standards update.

We appreciate the opportunity to provide feedback in this rulemaking process.

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¹ Comments on the Proposed 2019 CALGreen Requirements. 11/27/17.

http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN221854_20171127T071402_Statewide_Utility_Codes_and_Standards_Team_Comments_Comments_on.pdf

² Statewide Utility Codes and Standards Team Comments on Lighting Topics in 2019 Title 24, Part 6 Express Terms. 11/3/17. http://docketpublic.energy.ca.gov/PublicDocuments/17-BSTD-01/TN221679_20171103T170734_Statewide_Utility_Codes_and_Standards_Team_Comments_Statewide_U.pdf