

DOCKETED

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Staff Supplement to California Energy Alliance Code Change Proposal-Nonresidential Lighting Alterations

Date: 10/20/17

Pages: 2

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Subject: Nonresidential Lighting Alterations-Simple Compliance Methods

DESCRIPTION OF PROPOSED REGULATORY CHANGES

California Energy Alliance (CEA) code change proposal report, titled “Nonresidential Lighting Alterations-Simple Compliance Method,” proposes to make the following changes to the Standards:

- Include a new definition for a new term “one-for-one” in Section 100.1.
- Combine Sections 141.0(b)2.I and 141.0(b).2.J, which are “Entire Luminaire Alterations” and “Luminaire Component Modifications,” respectively, into a new section, titled “Altered Indoor Lighting Systems.”
- Reduce the maximum allowed lighting power requirement threshold between Options 1 and 2 from 85% to 80%.
- Propose a uniform power reduction value of 40% for all occupancies rather than the current mix of 50% for offices, retails, and hotels and 35% for all other spaces.
- Limit Option 3 to buildings or tenant spaces of 5,000 square feet or smaller.

Staff agrees with the proposed changes to Sections 141.0(b)2.I and 141.0(b).2.J, and has incorporated substantively similar changes into the proposed Express Terms.

Staff does not agree with the proposed changes to Section 100.1. Rather than introducing the additional term “one-for-one,” staff instead proposes to include the phrase “luminaire-for-luminaire” in Section 141.0(b) to achieve the same intent.

STAFF ANALYSIS AND CONCLUSION

Staff has analyzed the submitted CEA report and reached the following conclusions for the measures included in the Express Terms:

- Based on the evidence presented in the CEA report, the measures, as proposed, appear to be cost effective and the author appears to have appropriately followed the Energy Commission’s Life Cycle Cost methodology.

- Measure costs premiums presented in the CEA report appear reasonable and appropriate for the measure proposed.
- Measure energy savings presented in the CEA report appear to have been appropriately modeled and appear credible.

Staff additionally finds that the alternate proposal for Sections 141.0(b)2.I and 141.0(b).2.J falls within the analysis of the CEA report, and is found to be feasible and cost effective based on the report's analysis of the CEA proposal for Sections 141.0(b)2.I and 141.0(b).2.J.