

DOCKETED

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Illogical Change to Parking Garage Areas Definition

Additional submitted attachment is included below.

Feb 2nd, 2018

California Energy Commission
Building Energy Efficiency Standard Rulemaking - Dockets Unit
1516 Ninth Street, MS 4
Sacramento, CA 95814-5512
docket@energy.ca.gov

Robert A. Shearer, BSEE
1842 Phillips Way
Los Angeles, CA 90042-1039
(925)-640-0181
CET_BOB@roadrunner.com

Re: Docket # 17-BSTD-02

“PARKING GARAGE AREAS” DEFINITION RENDERED NONSENSICAL BY CHANGE

INTRODUCTION:

Robert Shearer applauds the efforts to reduce lighting power consumption in the State of California by your agency.

The 45-Day Language 2019 Building Energy Efficiency Standards Section 100.1 DEFINITIONS contains a change of the term “Daylight Transition Zone” to “Daylight Adaptation Zone” which renders this definition nonsensical.

ABSTRACT:

The change of the term “Daylight Transition Zone” to “Daylight Adaptation Zone” in the definition of “**Parking Garage Areas**” in Section 100.1 of the Building Energy Efficiency Standards is illogical as the term “Daylight Transition Zone” is still used within this definition.

THE ARGUMENT AGAINST ALLOWING THIS CHANGE:

“Daylight Adaptation Zone” is no less confusing a term than “Daylight Transition Zone” to the uninitiated.

Further:

The term “Daylight Transition Zone” is still in use in other portions of the standards, (for example; section 130.1).

CONCLUSION:

It is recommended that this change not be made.

Thank you,

Robert A. Shearer, BSEE