

DOCKETED

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Request on Commercial Lighting Compliance Forms

Additional submitted attachment is included below.

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California Energy Commission
Dockets Office
1516 Ninth Street, MS-4
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Subject: Docket No. 17-BSTD-02

Gentlemen:

Would you **please leave as is the manual (static) method of filling out of the Title 24 Part 6 Commercial Lighting compliance forms for both indoor and outdoor lighting applications** rather than require that these commercial Lighting Compliance Forms be completed only by online (dynamic) method. **The manual paper (static) method of completion of Lighting Compliance Forms has proven to work.** A change from manual paper (static) to electronic (dynamic) completion of the Lighting Compliance Forms in itself will not simplify the process. Rather, **what simplifies is to make sure that each required question on each form is as clear as possible.** It's OK to simplify the form(s) themselves by making sure each question is stated clearly; however, please do not force the "responsible person" to only have the choice of completing these compliance forms by online (dynamic) method only. **The Calif Title 24 commercial Lighting Compliance Forms that a "responsible person" signs of which I'm requesting the California Energy Commission to keep manual (static) include:**

- NRCC-LTO-01-E Certificate of Compliance (Outdoor)
- NRCC-LTO-02-E Outdoor Lighting Controls Certificate of Compliance
- NRCC-LTO-03-E Outdoor Lighting Power Allowance Certificate of Compliance

- OLTG-1C Certificate of Compliance (Indoor)
- OLTG-2C Lighting Wattage Allowances for General Handscape, Sales Frontages, or Ornamental Lighting
- OLTG-2C Lighting Wattage Allowances for Per Application or Per Area.
- OLTG-2C Additional Lighting Power Allowance for Ordinance Requirements

I did not list above the Title 24 commercial Lighting Controls Acceptance Test compliance form which generally is not completed by the "responsible person" of the lighting project, but rather is completed by a registered certified acceptance test technician. Since the Lighting Controls Acceptance Test compliance form is only one form and generally the last compliance form and generally not signed by the "responsible party," it is not included in my request to keep the filing of the Title 24 commercial Lighting Compliance Forms by manual (static) or by a choice of manual (static) or online (dynamic).

The "responsible person" who signs the Title 24 Part 6 Lighting compliance forms, the local jurisdiction, the CEC, and the end will be better served by manual (static) forms as has been the method, or by either manual (static) or electronic (dynamic) filling, rather than only by electronic (dynamic) filing. The responsible person who signs the Title 24 Part 6 commercial lighting compliance forms, is responsible for a minimum two forms for indoor lighting and two forms for outdoor lighting and sometimes an additional compliance form(s). Would you please keep this process from becoming more difficult by forcing only electronic (dynamic) filing. Thank you.

Sincerely yours, *Gary G. Smith, LC* San Jose, CA