

DOCKETED

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Acceptance Testing Requirement for Two PAFs Still Lacking

Additional submitted attachment is included below.

March 5th, 2018

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Re: Docket # 17-BSTD-02
Section 130.4 (a) Lacks requirement to test 2 PAFs

INTRODUCTION:

Robert Shearer disagrees with efforts to require lighting controls acceptance testing of Power Adjustment Factors; (PAFs).

The 45-Day Language 2019 Building Energy Efficiency Standards Section 130.4 (a) contains a requirement for acceptance testing of the “Institutional Tuning PAF; but *lacks* a requirement to test two others which appear on the NRCA-LTI forms.

ABSTRACT:

Section 130.4 (a): Two PAFs that appear on the Acceptance Testing Certificates do not appear in this section, while one PAF does.

This ...

Section 130.4 (a)

7. Certifies that lighting systems receiving the Institutional Tuning Power Adjustment Factor comply with Section 140.6(a)2J and Reference Nonresidential Appendix NA7.7.6.2.

... clearly states that the new (2016) Institutional Tuning PAF must undergo acceptance testing.

However, no such code exists for two other PAFs found on the Certificates of Acceptance:

140.6 (a) 2. H. “daylight dimming plus OFF”

140.6 (a) 2. I. “occupant sensing control(s) ... in large open plan office areas

CONCLUSION:

It is recommended that the following change be made.

Acceptance Testing of the two PAFs in question can be required by appending these two lines of code to section 130.4 (a):

8. Certifies that lighting systems receiving the Daylight Dimming plus OFF Power Adjustment Factor comply with Section 140.6(a)2H and Reference Nonresidential Appendix NA7.6.1.2.1 (e) 3.

... and ...

9. Certifies that lighting systems receiving the Occupant Sensing Control Controlling the General Lighting in Large Open Plan Office Areas Above Workstations Power Adjustment Factor comply with Section 140.6(a)2I and Reference Nonresidential Appendix NA7.7.6.1

Thank you,

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