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Project Title:	2022 Energy Code Pre-Rulemaking
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on NLCAA Response to CEC Staff Recommendations

Additional submitted attachment is included below.

From:	Wayne Alldredge
To:	Energy - Docket Optical System
Subject:	Response to NLCAA comments on CEC staff recommendations
Date:	Thursday, September 3, 2020 9:08:28 PM
Attachments:	image001.png

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RE:
Docket Number: 19-BSTD-03
Project Title: 2022 Energy Code Pre-Rulemaking
TN Number: 234581
Title: NLCAA Response to CEC Staff Recommendations

I'd like to amend what NLCAA has proposed in their statement…

"Expand NA7.6.2.3 to Include Acceptance Requirements for Each Type of Occupant Sensing Control

- Issue Statement

  -Remove the term occupant sensor (§130.1(c)5) as an auto-on technology throughout the codes and forms, occupant sensor is too similar to an occupancy sensor which is a device. Auto-ON as a possibility, we recommend asking controls mfgs what they may suggest as the terminology may already be in their instruction manuals. In discussion and clarifications of code it becomes confusing to some people."

I agree on the possibility of confusing the language, but suggest that the difference between a "Device" and "Mode of Operation" be delineated. "Motion Sensor" is no longer accurate because the latest technology of sensors detects occupant presence whether they are moving or not. Additionally, no one sells "Vacancy Sensors" as a specific device, yet that's what we call a manual-on/auto-off motion sensor in the field.

I suggest the term "Occupant Sensing Device" or "OSD" to replace the terms "Occupant Sensor" and "Motion Sensor" (as is the case outdoors) throughout the entire code and then use "Full-On", "Partial-On", "Partial-Off", and "Full-Off" to describe the mode that any OSD is programmed to control. The important point is not the names themselves, but to provide clear distinction between what is a physical device what is a mode of operation. NLCAA's recommendation of querying manufacturers for suggested names is a good idea.

Thank you for your time.

Wayne Alldredge, LEED-AP, WELL-AP, CEM, CEA, CBCP, EBCP, CMVP, GGP, CalCTP-AT, HERS
Associate Director O&M, Energy, and Commissioning Services

VCA Green | Orange + Oakland
714.363.4700 | vca-green.com
1845 W. Orangewood Ave., Ste. 220
Orange, CA 92868

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