

**DOCKETED**

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<b>Project Title:</b>	2022 Energy Code Pre-Rulemaking
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<b>Document Title:</b>	NLCAA Outdoor Photocontrol Test - Sampling request
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To: California Energy Commission

Docket: 19-BSTD-03

Project: 2022 Energy Code Pre-Rulemaking

Re: NLCAA comments on the Staff Recommendations for the 2022 Energy Code Acceptance  
Test Technician Certification Provider Program

NLCAA appreciates the opportunity to support with the CEC in the effort to create a synergy between the energy codes and the compliance documents. Having worked with these documents since 2014, we have found that the ATTCPs, ATTs and ATEs can provide an invaluable look into how these documents are interpreted, misinterpreted, understood or even misused, by many different professionals using the energy codes.

The following are NLCAA's comments:

**1. Add sampling to Outdoor Photocontrol test**

NLCAA is requesting that sampling be added to the Reference Appendices for outdoor photocells in groups of seven in outdoor luminaires. Integral lighting controls are becoming more common especially in outdoor luminaires. Currently, an ATT is required to test all photocells, but they can sample the motion sensors in groups of seven. Testing costs may be reduced as the number of photocell tests are reduced and this will align with the sampling method for motion sensors.

**NA7.8.4 Photocontrol Functional Testing (language to be added)**

For areas with up to seven (7) outdoor photocells, all outdoor photocells shall be tested. For areas with more than seven (7) outdoor photocells for outdoor luminaires, sampling may be done on outdoor areas with similar photocells that cover similar unobstructed areas; sampling shall include a minimum of 1 outdoor photocells for each group of up to 7 additional outdoor photocells. If the first photocells in the sample group passes the acceptance test, the remaining outdoor areas in the sample group also pass. If the first photocells in the sample group fails the acceptance test, the rest of the photocells in that group shall be tested and any failed photocells in the sample group shall be repaired or replaced and retested until the photocells passes the test.

**2. Change to outdoor language**

The term "buildings" used in NA7.8.2 does not reflect all scenarios where testing of the outdoor motion sensors are installed, like in integral luminaires mounted on light poles. An alternative term like "area" or "project" may be a better alternative.

**NA7.8.2 Motion Sensor Functional testing**

For ~~buildings areas~~ areas with up to seven (7) outdoor sensors, all outdoor sensors shall be tested. For ~~buildings areas~~ areas with more than seven (7) outdoor sensors for outdoor lighting system, sampling may be done on outdoor areas with similar sensors that cover similar unobstructed areas;



sampling shall include a minimum of 1 outdoor sensor for each group of up to 7 additional outdoor sensors. If the first sensor in the sample group passes the acceptance test, the remaining outdoor areas in the sample group also pass. If the first sensor in the sample group fails the acceptance test, the rest of the sensors in that group shall be tested and any failed sensor in the sample group shall be repaired or replaced and retested until the sensor passes the test.