

**DOCKETED**

<b>Docket Number:</b>	19-BSTD-03
<b>Project Title:</b>	2022 Energy Code Pre-Rulemaking
<b>TN #:</b>	237115
<b>Document Title:</b>	California Energy Alliance Comments - CEA Comments on Draft 2022 Energy Code Express Terms
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	California Energy Alliance
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/9/2021 5:11:39 PM
<b>Docketed Date:</b>	3/10/2021

*Comment Received From: California Energy Alliance  
Submitted On: 3/9/2021  
Docket Number: 19-BSTD-03*

**CEA Comments on Draft 2022 Energy Code Express Terms**

*Additional submitted attachment is included below.*



March 9, 2021

California Energy Commission  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

Re: Docket Number: 19-BSTD-03 - Comments on the Draft 2022 Energy Code Express Terms

Dear Commissioners and Staff,

Thank you for the opportunity to provide comments on the California Energy Commission (Energy Commission) Draft 2022 Energy Code Express Terms. The California Energy Alliance (CEA) is the leading advocacy organization for California's energy stakeholders. Founded in 2016, CEA is a nonprofit, non-partisan alliance of business, government, and NGO leaders advocating for energy productivity to achieve economic growth, environmental justice, energy security, affordability, and resilience. Our work focuses on advocacy, outreach, research, and evolution of codes, standards, and policy.

CEA had the opportunity to work collaboratively with its membership and the IOU Case Team on improving and expanding upon demand management standards. The joint work covered transitioning to a wattage threshold from a square footage threshold for demand responsive lighting, eliminating confusing language to simplify requirements for wider adoption, and incorporating demand responsive (DR) controlled receptacles to expand DR beyond lighting and HVAC.

While these recommendations were accepted, CEA would like to comment on the language put forth in Section 110.12 – Mandatory Requirements for Demand Management, (c) – Demand Responsive Lighting Controls. We are aligned with the comments submitted by Signify in Docket Number: 19-BSTD-03, TN# 237048 regarding the language of "nonresidential lighting systems...with a general lighting power of 4,000 W or more" to be modified to:

**Demand Responsive Lighting Controls.** Demand responsive lighting controls shall be required in buildings Nonresidential lighting systems subject to the requirements of Section 130.1(b) and with a general lighting power total connected lighting load of 4,000 watts or greater shall have controls that are. Lighting controls in nonresidential buildings larger than



~~10,000 square feet~~ shall be capable of automatically reducing lighting power in response to a Demand Response Signal. General lighting shall be reduced in a manner consistent with the uniform level of illumination requirements in TABLE 130.1-A.

CEA thanks the Energy Commission for the opportunity to submit these comments, and please let us know if you have any questions regarding our comments on Section 110.12 (c) of the 2022 Energy Code Express Terms.

Sincerely,

A handwritten signature in black ink that reads "Josh Dean". The signature is fluid and cursive, with the first name "Josh" being more prominent than the last name "Dean".

Josh Dean  
Executive Director  
California Energy Alliance

619-786-0979

[josh.dean@caenergyalliance.org](mailto:josh.dean@caenergyalliance.org)