

DOCKETED

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Comment Received From: David Wilds Wilds Patton, LC
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Comments regarding Residential Standards proposed changes

Additional submitted attachment is included below.



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ENCLOSURE: Attachment

"Pages from 2022 RESIDENTIAL STANDARDS 161102_2016_Title24_Residential_Lighting_Guide_web_0
2022 STANDARDS SECTION 150.0 RESIDENTIAL ONLY dwpld markup.pdf"

To Whom it may concern:

I am generally pleased with the way you are proposing to simplify the Residential Standards. However, there are three specific sections where I would recommend changes from your proposals. Please refer to my comments on the attachment, too.

I will describe them in detail here, as well.

- Section (k) 1, B.
~~Screw based luminaires~~~~Blank Electrical Boxes.~~ Screw based luminaires shall contain lamps that comply with Reference Joint Appendix JA8 or contain lamps as specified in Table 150.0-A including qualified colored lamps, dim-to-warm lamps, tunable-white lamps, color-tunable lamps, and Title 20-compliant LED lamps. The number of electrical boxes that are more than 5 feet above the finished floor and do not contain a luminaire or other device shall be no greater than the number of bedrooms. These electrical boxes must be served by a dimmer, vacancy sensor control, or fan speed control.

I am convinced that this section should be left out. It is self-referential to Table 150.0-A. I would caution staff to not duplicate information in more than one section or Table. Simple is better and duplicating the same thing in multiple places is confusing and introduces the opportunity for conflicting information. I would caution against this practice. It's simply unnecessary.

- Section (k) 1, C. i.
~~Shall not contain screw base lamp sockets~~ Be listed, as defined in Section 100.1, for zero clearance insulation contact (IC) by Underwriters Laboratories or other nationally recognized testing/rating laboratory; and

I am confused about the deletion of the requirement here for IC rated luminaires. I didn't find that requirement anywhere if this is actually struck out. Although an Airtite requirement is still in the code, without this section, IC would not be required. There is an exception at the end of this section regarding recessed luminaires for fire-rated and non-IC rated luminaires, so I believe we need to keep the struck-out part above.

- Section (k) 1, C. iv.
Meet the clearance and installation requirements of California Electrical Code Section 410.44. ~~For luminaires with hardwired ballasts or drivers, allow ballast or driver maintenance and replacement to be readily accessible to building occupants from below the ceiling without requiring the cutting of holes in the ceiling; and~~

I believe that since this requirement has nothing to do with energy efficiency, that it should not be added to the Standards. If it is still determined critical, for whatever reason, you should also refer to the National Electrical Code Section 410.16 for clothes closets. I would phrase it like this: "Meet the clearance and installation requirements of the clothes closet sections of the National Electric Code Section 410.16 and the California Electrical Code Section 410.116." **Adding the words clothes closets at least lets the reader know what we are referencing. I had to Google that section to find out what this requirement was about.**

Thank you for your attention to these issues.
I look forward to seeing these changes implemented.

Sincerely,



David Wilds Patton, L.C.

Principal

David Wilds Patton Lighting Design