

DOCKETED

Docket Number:	21-BSTD-01
Project Title:	2022 Energy Code Update Rulemaking
TN #:	238326
Document Title:	Signify Comments on the 2022 Building Efficiency Standards
Description:	N/A
Filer:	System
Organization:	Signify/Anthony Serres
Submitter Role:	Public
Submission Date:	6/21/2021 11:37:10 AM
Docketed Date:	6/21/2021

*Comment Received From: Anthony Serres
Submitted On: 6/21/2021
Docket Number: 21-BSTD-01*

Signify Comments on the 2022 Building Efficiency Standards

Additional submitted attachment is included below.



June 21, 2021

Submitted via e-mail

Dr. Andrew McAllister
California Energy Commission
1516 9th Street, MS-4
Sacramento, CA 95814

**Signify comments on the 2022 Building Energy Efficiency Standards
Express Terms**

Docket Number: 21-BSTD-01

Dear Dr. McAllister:

Signify (formerly Philips Lighting) appreciates the opportunity to comment on the 45-day language for the draft 2022 Energy Code.

Signify is a global leader in lighting products, systems, and services. Our understanding of how lighting positively affects people coupled with our deep technological know-how enable us to deliver digital lighting innovations that unlock new business value, deliver rich user experiences, and help to improve lives. Serving professional and consumer markets, we sell more energy efficient LED lighting than any other company. We lead the industry in connected lighting systems and services, leveraging the Internet of Things to take light beyond illumination and transform homes, buildings, and urban spaces.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Anthony Serres'.

Anthony W. Serres, LC
Manager, Technical Policy
Signify North America Corporation

c: (202) 412-6143

e: anthony.serres@signify.com



Comments

2022 Building Energy Efficiency Standards Express Terms

June 21, 2021

Signify welcomes the opportunity to comment on the 45-day language. Detailed comments on specific topics follow.

Section 110.12(a)2 – Demand Responsive Controls

We support the removal of the listed communication protocols in favor of a statement reflecting the use of wired or wireless communication pathways. This change supports flexibility and future-proofing of the code.

Section 120.6 (h)2 – Indoor growing, Horticultural Lighting

Thank you for listening to stakeholders and changing the value from 2.1 $\mu\text{mol}/\text{J}$ to 1.9 $\mu\text{mol}/\text{J}$ for indoor growing facilities. We support this value and believe it to be an appropriate level to be set.

Section 130.1 – Occupancy sensing control time out

The language “within 20 minutes of the control zone being unoccupied” is ambiguous. Within 20 minutes would suggest a time of less than 20 minutes, but not equal to 20 minutes. Our understanding is that the requirement for occupancy time out is 20 minutes or less so we suggest that this language be modified in every instance in the code, so it is clear that the time out permitted is a maximum of 20 minutes.

Section 130.1(a)1 – Mandatory Indoor Lighting Controls

We support the exemption of public areas from the manual control requirements. This change supports common practice.

Section 130.1(c)1, Exception 6 - Mandatory Indoor Lighting Controls

We support the exception to shut-off controls for lighting in stairways if the stairway is formally designated a means of egress. This change supports common practice.

130.1(c)6, - Partial off occupancy sensors for Open Offices

We support the proposed requirements for general lighting in open offices to be controlled with occupant sensing controls. We suggest a better solution would be include the proposed requirements for all “open plan offices” and not limit them to ‘office spaces greater than 250 square feet’. ‘Open plan office’ is a recognized industry term in lighting and architecture and

lighting and other building systems are often designed around applicability for use in open plan offices (e.g., style of office) rather than according to size.

Section 130.1(d)3c – Automatic Daylighting Controls

We oppose this change. Replacing "general" with "controlled" is not clear because the two terms are not equivalent. General lighting and controlled lighting do not necessarily mean the same thing. We suggest that the text remain as it is in the 2019 code because it was clear.

Section 130.2(c)3A(i) – Motion Sensing Controls

For clarity, we suggest the words 'other than' in the sentence be replaced with "not intended for". The first part of the sentence talks about outdoor luminaires while the second part talks about outdoor lighting applications so "other than" does not make sense in the text.

We propose:

“Outdoor luminaires ~~other than~~ not intended for Building Façade, Ornamental Hardscape, Outdoor Dining, or Outdoor Sales Frontage lighting, where the bottom of luminaire is mounted 24 feet above grade or lower; and, ...”

Section 150.0(k)(1) (B) – Mandatory Features and Devices

We are happy to see the inclusion of Title 20 compliant LED lamps as an option for screw-based luminaires. We applaud this commonsense change that only requires Title 20 compliance (and removes additional JA8 requirements) for lamps. The California Energy Commission’s pace-setting Title 20 LED lamp requirements, which have been in effect since Jan 2018, have consistently delivered high quality, high performance energy efficient products to the market and we are glad to see them gaining further acceptance within Title 24. This change eliminates additional labelling and certification requirements for lamp manufacturers and makes it easier to develop and deliver energy efficient products to address the needs of the California market.

The proposed text seems to require JA8 compliance for lamps that are not “general service lamps”, including state-regulated LED lamps and small-diameter directional lamps. We request that the California Energy Commission extend entry 5 in table 150.0-A to include all Title 20 compliant LED lamps as high efficacy lamps and remove the words “as general service lamps”. We also request that recessed downlights (#10 in Table 150.0-A) be moved to the high efficacy column.

END COMMENTS