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Express Terms 2022 NLCAA Comment

Additional submitted attachment is included below.



July 21, 2021

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 NLCAA as 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 on the Express Terms (45-Day Language):

Section 130.1(C)(5) - Occupant Sensing Controls are required or specified offices, multipurpose rooms, classrooms, conference rooms and restrooms.

The general lighting in the following areas are required to be controlled by Occupant Sensing Controls or partial-on occupant sensing controls or vacancy sensing controls: (the areas are not required to have multilevel lighting controls)

A. An area enclosed by ceiling height partitions that has only one luminaire with no more than two lamps ~~Occupant Sensor; or~~

B. Restrooms ~~Partial-ON Occupant Sensor, or~~

C. ~~Vacancy Sensor, where all lighting responds to a manual ON input only.~~

NLCAA Comments:

It is not clear to NLCAA on the purpose of this language change. NLCAA does not see how "An area enclosed by ceiling height partitions that has only one luminaire with no more than two lamps" makes any sense here. Also, why repeat that Restrooms are required to have an occupancy sensor when it is already one of the areas listed at the beginning of 130.1(c)5.

NLCAA once again recommends the following be used instead:

~~In areas required by Section 130.1(b) to have multilevel lighting controls, the occupant sensing controls shall function either as a:~~

~~A. Partial-ON Occupant Sensing Controls capable of automatically activating between 50-70 percent of controlled lighting power, or~~

~~B. Vacancy Sensing Controls, where all lighting responds to a manual ON input only.~~



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~~In areas not required by Section 130.1(b) to have multilevel lighting controls, the occupant sensing controls shall function either as a:~~

- A. Occupant Sensing Controls; or
- B. Partial-ON Occupant Sensing Controls **capable of automatically activating between 50-70 percent of controlled lighting power, or**
- C. Vacancy Sensing Controls, where all lighting responds to a manual ON input only.

"Exception to 130.1(c)5" In areas required by 130.1(b) to have multi-level lighting controls, the occupant sensing device shall function as a partial -ON occupant sensing control or vacancy sensing control.