

DOCKETED

Docket Number:	21-BSTD-01
Project Title:	2022 Energy Code Update Rulemaking
TN #:	238938
Document Title:	Sacramento Engineering Consultants Comments - Remove PAF and Tailored lighting
Description:	N/A
Filer:	System
Organization:	Sacramento Engineering Consultants
Submitter Role:	Public
Submission Date:	7/19/2021 3:33:23 PM
Docketed Date:	7/19/2021

*Comment Received From: Sacramento Engineering Consultants
Submitted On: 7/19/2021
Docket Number: 21-BSTD-01*

Remove PAF and Tailored lighting

Remove Power Adjustment Factors and Tailored from the energy Code.

Power adjustment factors are not worth the extra costs. The concept is by providing a lighting control method that is above-and-beyond what is required by Code you can reduced the amount of installed wattage on the compliance forms. In practice PAFs would increase the project costs, while requiring the engineer to design extra controls. No one wants to spend the money when it's overall simpler and cheaper to reduce the number of lights installed, or choose a lower wattage fixture. Like the old days when LEED buildings were the rage and in order to be 20% better than Title 24, the simplest and cheapest method was to install 20% less light fixtures. I can truthfully state that in 25 years of doing Title 24 compliance, I have never used PAFs.

Tailored is no longer needed. Before LED light fixtures have become the mainstream I used the tailored method quite a bit. A decade ago the only way you could get a retail store with lots of spot and track lighting to comply was to use Tailored. But gone are the days of 150 watt Metal Halide spot lights, replaced with 10 watt LEDs. It would be much better suited to give more Additional Allowance credits than continue to support Tailored as an antiquated methodology. There is also a fundamental difference between PAFs and Tailored- PAFs are do something above-and-beyond what is required in terms of more advanced controls to get a small bonus, while Tailored is perform a more compiled and time intensive compliance method for the possibility of increased allowance.