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Lutron Electronics Co, Inc Comments on the 2025 Building Energy Efficiency Standards, Title 24 Part 6, 15-day Language

Additional submitted attachment is included below.

June 26, 2024

Submitted via: <https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=24-BSTD-01>

Mr. Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Re: Docket No. 24-BSTD-01

Lutron Electronics Co., Inc. Comments on the 2025 Building Energy Efficiency Standards, Title 24 Part 6, Express Terms, 15-day Language

Dear Commissioner McAllister,

Thank you for the opportunity to review and provide comments on the 2025 Title 24 Part 6 15-day Language. These comments are submitted on behalf of Lutron Electronics Co., Inc.

As you may know, Lutron was founded in 1961 and is headquartered in Coopersburg, Pennsylvania. From dimmers for the home, to lighting management systems for entire buildings, the company offers more than 17,000 energy-saving products, sold in more than 100 countries around the world. In the U.S. alone, Lutron products save an estimated 10 billion kWh of electricity, or approximately \$1 billion in utility costs per year. The company's early inventions— including the first solid-state dimmer invented by Lutron's founder, Joel Spira—are now at the Smithsonian's National Museum of American History in Washington, DC.

Please find our detailed comments below. We look forward to working with you further on this important project. Please contact Michael Jouaneh at 484-809-2782 or mjouaneh@lutron.com if you have questions or would like more information on these comments. Thanks again for your consideration.

Respectfully submitted,



Pekka Hakkarainen, PhD
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The comments and suggested edits to the proposed 2025 Title 24 Part 6 15-day Language are shown below. The changes are indicated in the text by underlining (for additions) and ~~strikethrough~~ (for deletions) to the draft language.

Subchapter 1-100.0

Section 100.1 –Definitions and Rules of Construction.

Lutron comments: We recommend that the definition of Multilevel Lighting Control be amended to clarify that multilevel does not just include ON and OFF. The intention of the requirement is that a dimmer, scene control, or similar manual control allows occupants to choose different lighting levels beyond only full-on and full-off. Without this proposed definition change, a standard on/off toggle switch would meet the definition but would not fulfill the requirement.

Changes:

Multilevel Lighting Control enables the intensity of lighting to be adjusted upward and downward in addition to ON and OFF.