

DOCKETED

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Wattstopper-Legrand Comments on 15-Day Proposed Language

Additional submitted attachment is included below.

June 28, 2024

California Energy Commission
Commissioner Andrew McAllister
1516 Ninth Street
Sacramento, CA 95814-5512

RE: [Docket No. 24-BSTD-01](#) – 15-Day Language Comments for 2025 Title 24, Part 6

Legrand, especially its California based Wattstopper lighting control brand, appreciates the opportunity to submit comments on the lighting and lighting control portion of the 15-Day Language proposed for the 2025 Title 24, Part 6 Standard. We gratefully acknowledge the significant work put forward by all proposal teams, commission staff, commission consultants and other contributors to improve the energy efficiency and applicability of the Title 24 lighting and lighting control related sections.

We would like to first reiterate the general statement we offered in our previous letters of response on the Express Terms draft and the 45-Day language draft, which is to applaud the overall improvement in readability that has occurred in much of the lighting and lighting control code sections in the proposed 2025 version of the code. Believe that this clean up of the language will be a benefit to those who have to understand and apply the Energy Code.

While there has been much to celebrate in the proposed 2025 language, this letter will focus solely on a deletion of a single sentence that had been proposed since the Express Terms release for the 2025 Code. We believe this deletion is a major mistake, and truly regret seeing it disappear from the 15-Day language. We strongly believe that this deletion will lead to significant lost energy savings due to daylighting systems being disabled and ask that it be changed back to the previous 45-Day language. We're referring to:

Section 130.1(d)2F – Daylight Responsive Controls Override

In a space where manual controls are required, the manual controls shall be capable of turning off or decreasing light levels below the light level set by the daylight responsive controls. ~~Manual controls shall be permitted to temporarily increase electric lighting light levels above the light level set by the daylight responsive controls if the controls are configured to reset electric lighting controls back to the Section 130.1(d)3 defaults after electric lighting have been turned off or reduced by a manual control, occupancy sensor or timeclock.~~

Having previously voiced strong support for the second sentence in this section, which makes it clear that a daylighting system may have the ability to temporarily be overridden, we are alarmed that the 15-Day language suggests that sentence now be deleted from the final 2025 code.

We do believe there are small changes that should be made to that sentence but agree with the overall intent as previously stated – for sites where it is desired, allow occupants to temporarily override the max level set by their daylighting systems. (Regarding our suggested changes: We believe the words “shall be permitted” should be changed to “may be permitted” so sites do not have to allow this temporary overrides should they wish, and that the wording of that second sentence would be better handled by eliminating the phrase “or reduced”.)

Looking to better understand why the CEC decided to remove that sentence, the “Notice of 15-Day Comment Period, 2025 Building Energy Efficiency Standards and Reference Appendices” was no help, as it simply said in its table for 130.1(d)2F that the second sentence was deleted but no reason was provided. That such a substantiative change to the language, especially at this late date, was made without any given reason is especially concerning, and puts us at a disadvantage as we don’t know how to argue against a non-statement.

When educating lighting professionals on the Energy Code, we have shown designers that a temporary daylighting override is allowed, based on language we have found in the Compliance Manual. However, it would be beneficial to make this allowance absolutely clear to anyone who reads the code language itself, so we’ve advocated that it needs to be brought into the body of the Title 24 Energy Code. As a result, we were pleased that this was going to happen based on the previous 2025 draft proposals. And especially pleased that this opinion was included in the CLTC’s [“2025 Title 24 Lighting Language Cleanup Initiative”](#) which was developed through consultation with many individuals.

The deleted sentence in Section 130.1(d)2F should be returned because there are people who, if they believe they need more light to be able to complete their work and they don’t have the ability to override the system temporarily, may instead look for ways to completely disable it. In other Lighting Control sections, Title 24 does an excellent job of providing users the ability to override automatic lighting controls, based on the foundational devices laid out in Section 130.1(a) Manual Controls. Section 130.1(c) allows these manual controls to operate as temporary overrides for automatic time based shut-off controls. In Section 110.12(c), the Demand Response for Lighting requirements include the phrase “that are capable of” ensuring that while DR controls must be installed, the owner of that space still gets to determine in which space the controls shall operate. So, while clearly demonstrating the understanding that occupant interaction with controls is an absolute necessity for successful implementation of the Energy Code, we wonder why at this late date is the CEC removing the previously proposed sentence that makes this accommodation to the occupants available for the Daylighting Section of the code as well – especially when it’s been called out in the Compliance Manual for years.

We’re requesting that the CEC add back that second sentence of Section 130.1(d)2F with the modifications we’ve suggested above to the final version of the 2025 Title 24 Energy Code. The entire Section would then read:

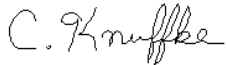
Section 130.1(d)2F – Daylight Responsive Controls Override

In a space where manual controls are required, the manual controls shall be capable of turning off or decreasing light levels below the light level set by the daylight responsive controls. Manual controls may be permitted to temporarily increase electric lighting light levels above the light level set by the daylight responsive controls if the controls are configured to reset electric lighting

controls back to the Section 130.1(d)3 defaults after electric lighting have been turned off by a manual control, occupancy sensor or timeclock.

If there is any discussion point in this letter where the CEC finds our concerns or suggestions unclear, we hope that you'll consider contacting us for clarifications. We've certainly enjoyed the opportunities we've had in the past to discuss the Energy Code language by phone, email, and in person, and hope to continue that positive relationship for many years to come.

Respectfully Submitted,

A handwritten signature in black ink that reads 'C. Knuffke'.

Charles Knuffke
Wattstopper Systems VP & Evangelist
BUILDING CONTROL SYSTEMS

Legrand, North and Central America
cell: 415.515.6004
email: charles.knuffke@legrand.us
www.legrand.us

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