

DOCKETED

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CHIEF COUNSEL'S OFFICE

Consulting Engineers

www.athans.com

March 31, 2015

The California Energy Commission
1516 9th Street, MS14
Sacramento, CA 95814

Subject: 2013 California Energy Standards

Dear Commission Members,

We have a 6-level parking structure with a pharmacy on the ground level and office on the 6th level.

I need to bring to your attention the fact that the following controls are not only burdensome and oppressive, but they are not technically feasible;

- a. Manual Area Controls
- b. Multi-Level Controls
- c. Automatic shut-off Controls
- d. Mandatory Daylighting Controls
- e. Demand Response Controls
- * Disaggregation of Electrical Loads

We certainly hope the CEC will correct this unfortunate condition ASAP or at least in the upcoming 2016 California Energy Standards.

Please contact me at the above address or phone number if you require additional information.

Very truly yours,

ATHANS ENTERPRISES, INC.

George A. Athans
Senior Vice President