

## DOCKETED

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## **Don't change standards because of cost complaints**

The base metric for a proprietary controls system is roughly 20-25% of an LED retrofit.

The savings from a sophisticated control program is approximately an additional 15% of the LED savings. I.e. LED takes a 200w bulb to a 100w LED. Add the controls and the savings would be like the light was only drawing 85w.

So there is little someone could say about the technology and its effectiveness. The only thing they can argue is if it costs the building owners too much.

If we deliver the same functionality, and I would argue that this company makes it brilliantly simply to commission, we take the standard pricing model of 20-25% and reduce those costs to approx. 3-4% of the total cost of a LED retrofit, we now have a brilliant response to the argument: It will cost too much!

My underwriting engineers are vetting the data from their first 3 and soon to be 19 installations for their accuracy to the claims of a safe 15% reduction in energy.

Don't change the standards because of cost complaints. The technology works and the companies who cannot provide an effective product for a fair price will either be forced to do so or will exit the market. California needs these standards if we are to meet our energy efficiency goals.