

DOCKETED

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Emerging Technologies Associates, Inc

May 19, 2015

Ms. Rachel MacDonald
Standards Implementation Office
California Energy Commission
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Dear Ms. MacDonald:

**Re: Docket 15-MISC-02
Comments to Title 24 2013 Standards – Recommendations for
Implementation**

Thank you for your leadership in making Title 24 a remarkable standard to help customers to implement lighting projects that will take them into the future proving to be a worthwhile investment. Your team is incredible. They do their best to help clarify and properly communicate the intent of the code.

I would like to offer a few observations and suggestions in an effort to assist the Commission in their continuing improvement of the code to increase adoption and projects being implemented. My comments are based upon my twenty years of experience as a Director of Facilities and involvement with management and training initiatives on a national level.

1. Organization or format of the Standard. The detailed nature of Title 24 presents a challenge regarding the best approach to organizing and the format of the various sections and subsections as well as other aspects of each. It is very difficult to follow with the constant reference or direction to other sections and the numerous exceptions with references to other sections. If possible, each section could be organized in a continuous read manner with the referenced sections written out in lieu of an apparent circular reference leading back to the current section. This lends itself to potential confusion and interpretation issues. Daniel Wong provided direction of the tool available in ENERGY CODE ACE. This is a great starting point. I recommend that ENERGY CODE ACE be the focus of webinars. Demonstrating the ease of navigation and availability of the incredible resources may help lessen the confusion and interpretation issues. Additional enhancements to ENERGY CODE ACE can address many of the issues causing confusion.



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2. Responsible Communication to the Authorities and Professionals. There are numerous seminar instructors presenting Title 24 2013 to customers. This in itself may be the cause of the interpretation challenges. The HOT LINE Team does an amazing job fielding, researching and responding to inquiries for clarification and/or validation. Unfortunately, some members of the public including the licensed professionals in the architect, engineering and contracting fields do not realize the availability of ENERGC CODE ACE or the Hot Line. Additionally, the inquirer has a difficult time expressing what they need to be clarified resulting in potentially more confusion. I recommend that the Hot Line implement a "key information" guide to be used when making inquiries. And all inquiries could be posted with the response by SECTION on the website so that others can check these clarifications before calling or writing the Hot Line. An additional benefit of a published approach to inquiry and response clarifications may be the promotion of a consistent response to similar scenarios or situations. This may result in less interpretation conflicts for the Authorities and Professionals as well as promote the "intent" of the code in a more consistent manner. These consistent responses could be organized in FAQ's organized by topic within each system and subsystems.

Ms. MacDonald, I hop that these high level comments can assist you and your team in the significant responsibility you all embrace and must address for the benefit of the State. I will be glad to submit comments for the current and future Dockets regarding Title 24 enhancements and changes.

Realizing your time is very valuable, I truly appreciate you taking time to read and consider my comments.

Feel free to reach out to me if you feel I may be of assistance for you and your incredible team.

Sincerely,

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