

DOCKETED

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Comment Received From: ROBERT A. SHEARER

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NRCA-LTI-03-A Misleading Formula "Scraps"

Additional submitted attachment is included below.

Aug 27th, 2015

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COMMENT PERIOD
RE: 2016 Nonresidential
Compliance Manual and Documents

Re: Docket # 15-BSTD-01
2016 Acceptance Testing Forms: Comment 04

INTRODUCTION:

The author is primarily concerned with changes to the Lighting Controls Acceptance Certification Forms included in the back of the 2016 Nonresidential Compliance Manual and will reserve comments on the other content of this manual.

ABSTRACT:

Misleading formula “scraps” exist on two “**System Power Reduction =**” entries within Form NRCA-LTI-03-A, the Daylighting Acceptance Testing Form.

EVIDENCE:

A cursory examination of this Acceptance Testing Form will disclose these errors.

The first: On line “t.” of (Page 7 of 11) only “computes” the continuously dimmed portion of a Daylighting System. Any properly trained Lighting Controls Field Technician will not need this formula “scrap” anyway; and might find it confusing. The removal of this one is *RECOMMENDED*.

The second: Found on line “m.” of (Page 9 of 11) is a more profound error. This formula “scrap” only “computes” the power reduction of partially-dimmed step-dimming ballasts in a system. This formula “scrap” is VERY misleading and its removal is *HIGHLY RECOMMENDED*.

ADDITIONAL COMMENTS:

The Acceptance Testing Forms for Daylighting have to allow for a variety of systems with varying sorts of illumination output. While single correct **System Power Reduction** formulas can be readily written – these are not them.

CORRECTIONS RECOMMENDED:

ON (PAGE 7 of 11)

t.	System Power Reduction = [1 – (line o) * (line s)]	
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Remove Misleading Formula “scrap”

ON (PAGE 9 OF 11)

m.	System Power Reduction = [1 – (line j)*(line l)]	
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Remove Misleading Formula “scrap”

CONCLUSION:

Thank you for considering my comments,

Robert A. Shearer, BSEE