

DOCKETED

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Additional submitted attachment is included below.



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CONTROLLED ENERGY

Energy Efficient Lighting & Controls

February 19, 2016

Docket Unit
California Energy Commission
Docket No. 16-BSTD-01
2013 Compliance Option for Nonresidential Lighting Alterations

TO: Members of the Commission and Staff:

We are writing to enthusiastically **endorse your proposal to implement the new Option 3** compliance pathway (based on energy savings of 50% or more for hotel, office, and retail occupancies, and 35% for all other occupancies) **immediately instead of waiting until 2017**.

This will simplify compliance while generating greater energy savings than the expensive requirements of the original 2013 standards. Our company has experienced sticker shock over the cost of the 2013 requirements and projects that were cancelled as a result. The lighting retrofit industry was based and developed on a cost-benefit basis of cost and payback from savings generated. That ratio essentially doomed most projects proposed by municipalities, school districts, colleges, and institutional customers once the 2013 Title 24 standards went into effect. The retrofit industry, not surprisingly, contracted in a direct ratio to the contraction in energy efficiency lighting retrofit projects.

Today, almost 2 years after 2013 standards went into effect, my company is still operating at less than 30% of the sales, income, and staffing that it enjoyed in the years before 2013 Title 24 standards. Competitors in the field who are allied in supporting Option 3 report similar reductions in their business activities. That means that this customer segment of the energy marketplace is not being served and the savings that would be generated are not being achieved.

This is not good for California, this is not good for the planet, this is not good for the future.

Something else that the CEC should be aware of is how the 2013 Title 24 standards have driven non-compliance underground since 2014. My company completed a project in late 2015 that triggered T24. When we pulled the permit, we fully expected to have to produce T24 compliance documentation. It was never mentioned or requested and the permit was issued. We then expected that the electrical inspector would ask for it in the final inspection, but that did not happen either, even after we explained what the integral occupancy sensor and photocontrol on the light fixture were for. Clearly, that permit department either did not know about T24 or had decided to ignore it as a complicated extra burden that it did not want to deal with.

Another customer, exploring a lighting retrofit for its facility announced that it would be done without a permit once we brought up T24 compliance for the outdoor light fixtures. It was stated in a way that there would be no discussion of T24 related to that project.

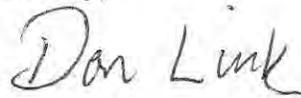
We bring this up because we hear from colleagues in the field that these situations are not unusual. Both building permit departments and clients undertaking lighting retrofit projects are ignoring or boycotting the Title 24 standards. This is a reality on the ground and more reason for the CEC to simplify and streamline the standards so that they are practicable for the people on the ground who have to comply

with and enforce them in the real world where they apply. I heard today of a very small project involving 10 light fixtures where the municipal permit office demanded that it meet full T24 requirements, every measure, Period. This is another misunderstanding and misapplication of T24 standards in the marketplace we work in.

There's a lot of ignorance and confusion out there today, and some scofflaw intent as well. Building engineers who never questioned the value of an electrical permit in the past are today weighing whether to go through that process given the strictures and cost of T24.

Concluding, we applaud the CEC's willingness to make the implementation of the 2016 standards immediate rather than waiting until 2017. That will address some of the damage done to the lighting retrofit industry and the energy savings it reliably delivers to its customers and to the state of California.

Sincerely,

A handwritten signature in black ink that reads "Don Link". The signature is written in a cursive, slightly slanted style.

Don Link, President