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Controlled Energy Comments on the Feb. 9, 2016 T24 Compliance Workshop

Additional submitted attachment is included below.

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California Energy Commission
Docket 16-BSTD-02 Controlled Energy Comments on the Feb. 9, 2016 Workshop on Title 24 Compliance

TO: Members of the Commission and Staff

We were not able to attend this workshop, but have learned of a proposal to require Acceptance Testing Technician (ATT) verification of existing lighting fixtures and wattage load before the lighting retrofit project is done. Unless this proposal is for a dry-lab, drive-by inspection, we are talking about a very expensive verification process with potential inspection of every fixture involved and careful data logging by technicians already empowered to charge just about anything they want to perform the other ATT duties. We can't imagine that they will charge less for this proposed new requirement.

Picture it: verification of every fixture mounted at 30 ft. above the floor in a warehouse, or every fixture in an office building or retail store. Ladders, lifts, shutting down the lighting to make inspection safe, etc.. Most retrofit contractors today do not do this, but spot check the fixtures to verify consistency of fixture and lamp type. If a mixture is found, an average is used to determine existing wattage (e.g. a mixture of 60 and 75 watt 8-ft fluorescent lamps of 2 to 1, averaging out at 65 watts each).

Accuracy is important to lighting retrofit contractors because they are promising electrical savings to customers in both wattage and dollars. Customers are quick to complain if the promises are not close to the actual results after the retrofit, and they have recourse against the Contractors License if they are lied to in the project proposal. These projections are part of the sales and marketing process for lighting retrofit contractors. Accuracy is key to their credibility in the market place. They do this already, and they are good at it. The ATT will probably be new to this activity, and neither very adept nor speedy in accomplishing it. This adds up to substantial added costs for small and medium sized retrofit projects.

Most Third Party rebate programs funded by the California Public Utilities Commission, moreover, inspect projects before and after to assure that public monies used for the rebates are accomplishing the energy- saving goals approved by the CPUC when it adopts Third Party programs.

A new requirement of this sort adds new delays and costs to the streamlined Option 3 and is redundant and unnecessary in most cases.

As our earlier comment about 16-BSTD-01 stated, we fully endorse the Option 3 compliance path because it allows straightforward lighting retrofits without rewiring lighting branch circuits and installing a bevy of expensive and not very cost-effective new controls. Adding this new, out-of-the-blue requirement this late in the game is not acceptable, nor good policy. In fact, it smacks of obstructionism by the folks who lost the battle in 2015 when the 2016 T24 standards were being crafted.

To give with the right hand and take away with the left now, strikes us as unfair and unwise. Leave Option 3 alone after 10 months of wrestling over it and get on with enjoying the energy savings the lighting retrofit industry has delivered reliably for almost 30 years until derailed by over-reaching and wrong-headed "improvements" in the 2013 Title 24 standards. If they had worked as designed (actually "dreamed about") there would never have been a need to revise them. Engineers of the world, be careful about what you wish for: nature and the marketplace are stronger and more in touch with what is possible than you are.

Dump this ATT verification proposal and let the lighting retrofit industry get busy and back at what it does best—saving energy. Our 31 years doing this has proven to us that it works and works well: to the benefit of our customers, our State, and our planet. Mucking with it imperils them all. Ever heard of global warming?

Sincerely,

Don Link, President

