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Keep it simple, please!

Stanford University opposes the proposal put forth to add a Compliance requirement that existing fixture types and wattage for lighting retrofit projects must be verified only by Acceptance Test Technicians (ATTs). Doing so would be unnecessary and expensive. Over recent months Stanford has provided input on the development of the 2016 Code for lighting retrofits because the 2013 Code halted the university's group re-ballasting program. The new "Third Compliance Option" in the 2016 Code puts appropriate and sensible rules back in place. However, requiring ATT testing would add further cost and delay to projects that have already been deferred a year or more.

Stanford trusts its selected lighting vendors to document as-built conditions and perform work as contracted, with an appropriate level of oversight from university and (when applying for rebates) utility staff. Our position is that the evidence required to document the existing fixtures and system wattage should be simple, clear, and inexpensive to provide. Compliance forms should be highly streamlined and electronic. This can be done by using something like a spreadsheet that gives detailed space-by-space descriptions of preexisting and newly installed fixture types, counts and wattage, along with total existing and new wattage and percentage savings. This would be extremely simple for any jurisdiction to review, and is similar to what contractors already supply to utilities for rebate purposes.

In summary, Stanford University opposes adding any requirement for ATT involvement in verifying existing conditions for lighting retrofit projects. Doing so would add significant additional costs and delays onto the compliance process which were not anticipated when the Code was developed, and if imposed would achieve the exact opposite of CEC's stated goal of "improving compliance without increasing transaction costs."