

DOCKETED

Docket Number:	16-BSTD-01
Project Title:	2013 Compliance Option for Nonresidential Lighting Alterations
TN #:	210518
Document Title:	Stan Walerczyk Comments: Nonresidential Lighting Alterations Alternatives for Demonstrating Compliance with the Existing 2013 Standards
Description:	N/A
Filer:	System
Organization:	Stan Walerczyk
Submitter Role:	Public
Submission Date:	2/23/2016 5:34:47 PM
Docketed Date:	2/24/2016

Comment Received From: Stan Walerczyk

Submitted On: 2/23/2016

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Nonresidential Lighting Alterations Alternatives for Demonstrating Compliance with the Existing 2013 Standards

Dear Sirs and Madams

Following are several points regarding improving existing and upcoming Title 24s for lighting retrofits.

50% WATTAGE REDUCTION REQUIREMENT IS NOT FAIR

The 50% reduction requirement for the easy and inexpensive Title 24 path is not fair.

8 – 10 years ago others and I specified numerous retrofits in offices, etc. that were installed. Many 2x4s were retrofitted with 2 3100 lumen 32W F32T8 850 lamps, reflector, .77 BF high performance ballast and often high performance lens, which consumes 48W or 1 3100 lumen 32W F32T8 850 lamp, reflector, .77 BF high performance ballast and often high performance lens, which consumes 25W. Although bare lamp and ballast efficiency is about 100 LPW, the out of fixture LPW is probably 80 – 90 with heat and fixture efficiency, including lens losses. These fluorescent T8s only lose 8% of light at end of rated life.

Cutting the wattage in half down to 24 and 12.5W while maintaining enough light will probably not work, because we do not have 160 - 180 out of fixture LPW LED TLEDs, LED light bars or LED troffer kits yet at a decent price. Most LED products lose 30% of lumens at end of rated life, so extra wattage may be necessary to provide sufficient light at end of rated life.

Others did similar projects with 28W or 25W fluorescent T8 lamps, high performance ballasts, maybe also 95% reflective reflectors and maybe also high performance lenses.

So end-customers, who have being a good job over the years being efficient, can be penalized, and other end-customers, who have kept junky lighting, will be blessed.

NO CONTROLS SHOULD BE MANDATED

As I have brought up numerous times before, there are many applications, especially private offices and elementary classrooms where people manually turn off lights when they leave, and after occupancy sensors are installed, annual burn time can increase, because the people allow for the 10 – 15 minute automatic delay.

Often people can manually turn off or dim lights when sufficient daylight.

PLEASE ALLOW SUFFICIENT WATTAGE, WHICH IS REQUIRED FOR EXTRA LUMENS FOR HUMAN CENTRIC LIGHTING

As I have brought up numerous times before, what is the sense of saving every KWH if worker productivity, student learning or patient recovery goes down even 1%?

Title 24 should allow extra wattage for 30 – 45 minutes in the morning or other non-peak times as long as there is an automatic controller.

BIG BROTHERS, SUCH AS THE CEC, ARE NO LONGER HELPFUL FOR LIGHTING RETROFITS

In the big picture, the CEC should just get out of the way with lighting retrofits and allow the free market, including lighting professionals and end-customers, decide what is best on each project.

Please, anybody from the CEC explain why you think more energy from lighting retrofits will be saved from your proposed modifications than with no Title 24 or even with how most people handled the 2010 Title 24 version.

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