

## DOCKETED

<b>Docket Number:</b>	16-BSTD-02
<b>Project Title:</b>	2016 Nonresidential Lighting Alteration Enforcement
<b>TN #:</b>	210544
<b>Document Title:</b>	Integrated Power & Lighting, Inc. Comments: On Nonresidential Lighting Alteration Enforcement Workshop
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Integrated Power & Lighting, Inc.
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/26/2016 2:21:01 PM
<b>Docketed Date:</b>	2/23/2016

*Comment Received From: Integrated Power & Lighting, Inc.*

*Submitted On: 2/26/2016*

*Docket Number: 16-BSTD-02*

**On Nonresidential Lighting Alteration Enforcement Workshop**

*Additional submitted attachment is included below.*



February 23, 2016

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 16-BSTD-02  
1516 Ninth Street  
Sacramento, CA 95814-5512  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)

**Subject:** Nonresidential Lighting Alteration Enforcement Workshop Comments and Application  
Inspection Cost Estimates

To Whom It May Concern at the California Energy Commission:

Our company, Integrated Power & Lighting, Inc., is dedicated to electrical testing and certification services and we work statewide. Much of our service business is California State Certified Acceptance Testing.

My partner and I also have considerable background experience in electrical contracting work including energy efficiency retrofitting.

The purpose of this letter is to comment on the following issues relating to the new Title 24 Part 6 code regulations:

1. Enforcement Challenges
2. Competition Fairness
3. Solutions to Enforcement
4. Cost of Enforcement

### 1. Enforcement Challenges

As you know, 2013 code compliance with nonresidential lighting requirements is currently enforced through a combination of acceptance testing and local building inspection requirements. These inspection and acceptance test requirements work well - acceptance tests are very effective at producing high rates of compliance with Title 24 energy efficiency regulations. From our view, most building inspectors focus on safety issues. They just don't have the time or budgets to spend on verification of meeting energy code requirements. Acceptance testing has changed that by allowing inspectors to simply verify that the acceptance test that has been signed by a state certified acceptance tester who is employed by a state certified acceptance test employer.

"Electrical Services For Today's Changing Technologies"  
80 Oldenburg Lane  
Norco, CA 92860  
(951) 270-0575 Office  
(951) 270-0574 FAX  
[www.IntegratedPowerAndLighting.com](http://www.IntegratedPowerAndLighting.com)  
CA License No. 993105



We understand that the new Title 24 includes an advanced lighting control exemption for lighting alterations that reduce power consumption by 35% or 50%. Unfortunately, this new code provision is not enforceable under current local building inspection requirements because building inspectors do not conduct pre-construction inspections. The problem with that is that once the original lighting equipment is gone it is essentially impossible to really be certain that the new lighting actually reduced the lighting power by either the 35%, or the 50%, that is required.

Without an inspector actually verifying the baseline lighting and power, property owners and contractors will have a serious financial conflict of interest. There will be a tremendous incentive to misrepresent the baseline and/or the savings calculation to save money on the lighting project.

Should we trust property owners and contractors to just sign a verification form and/or include photos? With all our many years of experience in the electrical contracting, lighting, and acceptance testing sectors, I can tell you – ABSOLUTELY NOT! When it comes to money, unfortunately, people will cheat.

## **2. Competition Fairness**

Enforcement and verification of title 24 requirements is a major issue for competition fairness – especially with the upcoming 35% and 50% reference points. In our business we see contractors competing for lighting work on a daily basis. Most contractors will do whatever they can to sell a job – even if some aspects of the project are misrepresented.

One of the ways that some contractors win a job is to give the customer a lower price by bending or evading code requirements. Ethical contractors who comply with the code rely on inspection and acceptance test requirements to make their bids realistic – that is preventing their quotes from being undercut by those who misrepresent to avoid code costs. A strong and effective inspection requirement is essential to protect good contractors who implement the code. Otherwise, they will not be able to compete against those who cheat.

## **3. Solutions to Enforcement**

President Regan provided us with the solution – “trust but verify”. We must have real, live inspectors who see the job in person before and after 2016 code lighting work. Fortunately, there already are California State Certified Acceptance Testers all over the state who know lighting and can do the inspection work competently and at a reasonable cost. Building departments and inspectors know and rely on Acceptance Tester’s work so this system is ready to go.

## **4. Cost of Enforcement**

I have heard the argument that using acceptance testers is too expensive and I strongly disagree. As a company that does a lot of this work we know the pricing very well and have prepared the following estimates for your information. Please understand that these are solid numbers for third party inspections that include travel both ways for a pre and post inspection, paying our ATs well, and a reasonable profit for our company.



TOTAL COST ESTIMATE FOR PRE AND POST INSPECTION PLUS REVIEW OF ENERGY SAVING CALCULATIONS

Third Party Inspection Service

20 Luminaires	75 Luminaires	250 Luminaires	500 Luminaires	1000 Luminaires
\$450.00	530.00	600.00	800.00	\$1,350.00

Please do not hesitate to contact me if you need more information. Thank you for this opportunity to comment.

Sincerely,

*Jeff Bernardino*

Jeff Bernardino  
President  
Integrated Power & Lighting, Inc.  
80 Oldenburg Lane  
Norco, CA 92860  
[jbernardino@integratedpowerandlighting.com](mailto:jbernardino@integratedpowerandlighting.com)  
[www.integratedpowerandlighting.com](http://www.integratedpowerandlighting.com)  
(909) 270-0575

"Electrical Services For Today's Changing Technologies"  
80 Oldenburg Lane  
Norco, CA 92860  
(951) 270-0575 Office  
(951) 270-0574 FAX  
[www.IntegratedPowerAndLighting.com](http://www.IntegratedPowerAndLighting.com)

