

DOCKETED

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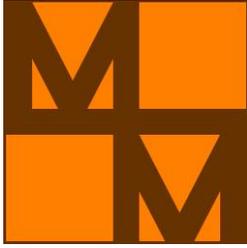
Comment Received From: Craig Ochoa

Submitted On: 3/15/2016

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Comments on 2016 Lighting Alteration Chapters in the Nonresidential Compliance Manual

Additional submitted attachment is included below.



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Celebrating 50 years

To Whom it May Concern,

These comments are filed in response to the proposed Lighting Alteration Chapters in the 2016 Nonresidential Compliance Manual:

- ... We are strongly opposed to the proposed compliance requirements for the 2016 Title 24, Part 6 advanced lighting control exemption for lighting alterations that reduce power consumption by 50% or 35%.
- ... The proposed compliance requirements do not provide a legitimate mechanism to verify contractor claims of actual energy savings.
- ... The current proposal incentivizes fraud and abuse because it leaves the Statute essentially unenforceable while allowing property owners and contractors to misrepresent existing baseline power consumption with no verification prior to the existing lighting being removed and disposed of.
- ... The high standards of code compliance and professionalism of the legitimate contractors within the electrical industry, as well as responsible property owners, will become a competitive liability in the marketplace, thus opening opportunity to questionable entities out for the quick buck and leaving those opportunities for meaningful energy savings unrealized, California's aggressive energy efficiency goals unmet, and our energy infrastructure at risk.

Thank you
Craig Ochoa,
Lighting and Controls Department Manager
Lighting Specialist