

## DOCKETED

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*Comment Received From: Stan Walerczyk*

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## **Does Title 24, Even with 15 Day Language, Provide any Benefits?**

This is important, because if the CEC does not provide any lighting retrofit benefits in Title 24, why should lighting professionals, end-customers, jurisdictions and any others have to pay any heed to the CEC?

If the CEC disagrees with any of my following five statements regarding lighting retrofits, please make a public statement with good evidence.

MUCH MORE ENERGY WOULD BE SAVED FROM LIGHTING RETROFITS WITHOUT THE CURRENT TITLE 24, EVEN WITH 15 DAY LANGUAGE, OR WITH THE WAY THE 2010 AND PREVIOUS TITLE 24s WERE GENERALLY HANDLED. IF IT AIN'T BROKE, DON'T FIX IT AND THE PREVIOUS TITLE 24 WORKED WELL FOR LIGHTING RETROFITS.

THE FREE MARKET WOULD GET LOW LPDs WITHOUT TITLE 24.

THE 35%/50% RULE IS UNFAIR, BECAUSE IT BLESSES END-CUSTOMERS, WHO HAVE KEPT INEFFICIENT LIGHTING AND PENALIZES END-CUSTOMERS, WHO HAVE DONE GOOD PREVIOUS RETROFITS AND WANT TO DO RE-RETROFITS.

MANDATING CONTROLS CAN OFTEN MAKE FINANCIAL RETURNS WORSE AND CAN KILL NUMEROUS PROJECTS THAT WILL GET LOW WATTAGE LED PRODUCTS AND HAVE PEOPLE PROPERLY USING MANUAL CONTROLS. THE FREE MARKET INSTALLS CONTROLS WITH OR WITHOUT DIMMING WHEN THEY ARE COST EFFECTIVE.

THE CEC DOES NOT GRASP THE IMPORTANCE OF HUMAN CENTRAL LIGHTING. IT DOES NOT MAKE ANY SENSE TO SAVE EVERY KWH, IF WORKER PRODUCTIVITY, STUDENT LEARNING, ETC. IS REDUCED EVEN 1%.

CEC, please respond, and if you cannot show good evidence contradicting my statements, why should anybody pay any attention to you regarding lighting retrofits and why are you wasting tax payer dollars on your salaries, etc.?

Stan

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