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ADOPTION OF 2016 OPTION 3 LIGHTING ALTERATIONS TITLE 24 PART 6

If option 3 is adopted into the 2013 Title 24 Part 6 code we have concerns on the calculation of power reduction applicable to the new option. In 130(c) Title 24 Part 6 of the 2013 code it prevents a calculation of actual power reduction when direct fit LED tubes are used with new ballast/drivers. This was originally derived from the aspect which would allow higher wattage fluorescents to be continued to be used in the same sockets. However recent generations of the direct fit LED product with Ballast/Drivers are being introduced to the market that will not operate fluorescent product and void UL listing if they are used. We believe this language must be modified to recognize these changes and to base the actual wattage reduction on tested data output.