

DOCKETED

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Comment Received From: Douglas Avery

Submitted On: 7/6/2017

Docket Number: 17-BSTD-01

Re:Docket No. 17-BTSD-01 â€“ Non-Residential Lighting Measures for 2019 Standards

Additional submitted attachment is included below.

July 5, 2017

California Energy Commission
Docket No. 17-BTSD-01
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 17-BTSD-01 – Non-Residential Lighting Measures for 2019 Standards

With 40 years in the lighting industry, I trust that my comments will be helpful to the Commission.

I support limiting the use of the 35/50% option by building size. After reading the California Energy Alliance's (CEA) proposal, the 5000 sf ft threshold makes good sense. According the CEA report, raising that threshold to 10,000 or higher will allow 70 percent of California building or more to continue using this approach to compliance. Existing buildings really need to upgrade to more efficient technology and use lighting controls. Having no limit or a larger building size limit on the 35/50% approach will not help make this happen.

To meet the mandated energy goals that have been legislated, advanced building controls have to be installed and operated. This included HVAC, Mechanical and Lighting Controls. With controls, we will meet the energy goals that have been set forth. The good news is that advanced controls are cost effective, there is a trained labor force available to install and maintain these systems, and ample evidence to support the energy savings and improved occupant satisfaction that accrue when these systems are operating in the built environment.

Most lighting system retrofits going on today are being done when a new owner or tenant takes over a building. These types of tenant renovations should not be using the 35/50 percent compliance approach as the code stands today, but the way the code is written is vague on this topic. The compliance manuals even go so far as to put all the compliance options side-by-side in table as if they are equivalent. Adding an explicit limit like 5000 sq ft will make it very clear in the code that tenant renovations needs to follow the traditional compliance approaches that rely on standards for new construction.

Allowing small buildings and tenant spaces to make upgrades acknowledges that costs can be an issue for some small business. Adding the size limitation will better ensure that larger buildings and buildings that are making tenant improvements invest in upgrades that will modernize the building. An important element of that modernization is the incorporation of smart building capabilities such as automated demand response. Those control strategies reduce energy costs for building owners and operators by enabling internal demand response, and facilitating participation in rate lowering utility programs.

I would also like to voice support for the proposal for clear and concise one-for-one language. It is very much needed to reduce considerable confusion and improper application of code provisions.

The California Advanced Lighting Controls Training Program strongly supports the CEA's proposal and urges the California Energy Commission to adopt all proposed changes to the current code in the 2019 code language.

Thank for the opportunity to comment on these important issues.

Sincerely,

Douglas Avery
President Avery Energy Enterprises
Co-Chair California Advanced Lighting Controls Training Program

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