

DOCKETED

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Comment Received From: Jeffrey Scott Davis

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17-BTSD-01-Non Residential Lighting Measures for 2019

Additional submitted attachment is included below.



July 7, 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

Our company has been doing lighting contracting work for (27) years and we are very committed to improving the Non-Residential Lighting Measures for 2019 Standards.

We understand that CEC staff is considering two CASE report based proposals and that there are some very significant differences between them. One that we are extremely concerned about is the choice between the following two options on commercial lighting retrofits:

- a) Continuation of the current 2016 code 35/50% pathway concept (but going to 50% for 2019) with no limit on building size, or
- b) The proposal for a 5,000 square foot limit on buildings that can use the 50% more efficient lamps approach

Our company strongly supports “b”, the 5,000 square foot limit and nothing larger. We do a lot of lighting retrofits and the current 35/50% option is not working. 35/50% encourages property owners and managers to do very shallow retrofits and leave a lot of energy savings on the table. In most cases we won't have another chance to go back to them for deeper energy saving retrofits for ten to fifteen years. We don't believe we can meet California's energy goals this way.

Another problem is that the 35/50% pathway leaves out automated demand response (ADR) capable controls. When the 35/50% is used - and then the customer wants to participate in a money-saving utility ADR program, they have to spend more to retrofit their lighting system again to add the ADR capable controls. This is very inefficient and costly; it should be done right the first time.

Raising that threshold to anything larger than 5,000 square feet will allow too many of California's buildings to continue using the flawed “more efficient lamps only” approach to compliance. Existing buildings really need to upgrade to more efficient technology and use lighting controls with ADR capability. Having a larger than 5,000 square foot limit on building size for the 35/50% (or all 50%) approach would allow too many buildings to opt out. For example, if the limit were 10,000 square feet, that would be about 70% of California buildings.



We would like to point out that the 5,000 square feet must apply to buildings not spaces in buildings. This is important because if the 5,000 square foot applies to spaces in larger buildings, some contractors will just split up those larger buildings into multiple 5,000 square foot projects to defeat the 5,000 foot limit.

Enforcement is a significant issue with the 35/50% or all 50% pathway. Too many property owners and lighting contractors are tempted to claim they are getting 35% or 50% savings from lamps alone when they are not. Without an inspection prior to retrofit there is no way to stop misrepresentation. As a state we shouldn't be using a system that invites abuse, nor should we be claiming savings that cannot be verified.

Finally, we would like to voice our support for clear and concise one-for-one language. It is very much needed to reduce considerable confusion and improper application of code provisions.

Thank you.

Sincerely,

Jeffrey S. Davis
Vice President Construction

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