

DOCKETED

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Comment Received From: Sachu Constantine

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Center for Sustainable Energy's Comments re: 2019 Building Energy Efficiency Standards

Additional submitted attachment is included below.



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July 13, 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

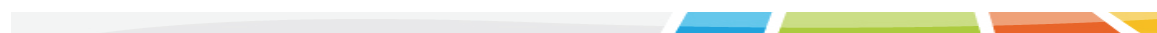
As an active participant and stakeholder in California energy efficiency measures, the Center for Sustainable Energy® (CSE) is pleased to provide these comments regarding the Non-Residential Lighting Measures for 2019 Standards to the California Energy Commission.

To meet the legislatively mandated energy goals, advanced building controls will need to be installed and operated. This includes HVAC, Mechanical, and Lighting Controls. Thankfully, these advanced controls are cost-effective, there is a trained labor force available to install and maintain these systems, and ample evidence exists to support the energy savings and improved occupant satisfaction that accrue when these systems are operating in the built environment.

CSE supports limiting the use of the 35/50 percent compliance option by building size. After reading the proposal by California Energy Alliance (CEA), the 5,000 sq. ft. threshold makes sound sense. According to the CEA report, raising that threshold to 10,000 sq. ft. or higher will allow 70 percent of California buildings or more to continue using this approach to compliance. It is crucial that existing buildings 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 enable this to happen.

Most lighting system retrofits being performed today are done when a new owner or tenant takes over a building. These types of tenant renovations should not use the 35/50 percent compliance approach as the code stands today. Adding an explicit limit, such as the 5,000 sq. ft. threshold, will clarify in the code that tenant renovations must follow the traditional compliance approaches that rely on standards for new construction.

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



Lastly, we strongly support the proposal for clear and concise one-for-one language, as it is very much needed to reduce considerable confusion and improper application of code provisions.

CSE appreciates the opportunity to comment on these important issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Sachu Constantine". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Sachu Constantine
Director of Policy
Center for Sustainable Energy®

cc: Payam.Bozorgchami@energy.ca.gov
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