

DOCKETED

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Comment Received From: Michael Scalzo

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

Additional submitted attachment is included below.



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

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

Thank you to the commission staff for your efforts and the opportunity to provide comments on this docket. These comments are based on feedback and experiences in the field from NLCAA's Acceptance Test Technicians (ATT's) & Employers (ATE's) and myself as an ATT since July 2014 and having performed roughly over 1000 functional test on over 250 projects throughout California.

Section 130.1(c)5 Areas where Occupant Sensing Controls are required to shut OFF All Lighting

- Remove the term "room", it is not consistent with the rest of the code.

Section 130.1(d)1A. Skylit Daylit Zone

Definition

- Leave the introduction language, it covers the requirements of laying out the zones and is extremely helpful and accessible to all
- Add a definition of daylit zone for atria.
- Exempting areas under skylights that are shaded at least half of the time (1,500 hours) during the timeframe of 8 a.m. to 4 p.m.
 - We have concerns on how this will be documented and verified, as it stands now quite often ATT's and installers are working with plans where the daylit zones are not correctly documented on the plans that have passed plan check, which the ATT is required to verify and document during the testing procedures. Relying on the AHJ Plan Check or Inspection teams to verify the shading is not realistic in all jurisdictions; some/most AHJ's are already relying on the ATT's for anything T24 related compliance. There are designers that use every tool available to reduce the amount of controls on projects for cost reduction and this could just become another tool for them to remove energy conservation controls that should be required.
 - This also could apply to Sidelit fenestrations too.



EXCEPTION to 130.1(d)1B & C

- Provide an exception for areas near windows from being considered as primary or secondary sidelit zone when the horizontal projection of overhang distance is equal to the window head height. Energy savings are reduced by around 50 percent when the ratio of the overhang projection to the window head height is 1.0 or greater.
 - We feel that this exception will resolve many issues when it comes to the testing of daylit zones that have this condition. The design of daylit zones seem simple enough during the design phase utilizing the code requirements. The issue is during the testing procedures when verifying the overhang, it may not match the designed overhang and will need to be verified and documented by the ATT during the testing procedures. It will be critical how the code clarifies the requirements of this condition.
 - Other conditions that should be considered for exception:
 - North facing fenestration that cannot receive enough daylight (reference illuminance) to pass the testing procedures which is typically all North facing fenestrations.
 - Fenestration that is completely blocked; i.e. buildings directly up against other buildings, very close nearby buildings, stained glass windows.

Section 130.1 (e) Demand Responsive Controls.

- Language cleanup- Clarify projects over 10,000 ft² verses buildings over 10,000 ft².
 1. Buildings larger than 10,000 square feet, excluding spaces with a lighting power density of 0.5 watts per square foot or less, shall be capable of automatically reducing lighting power in response to a Demand Response Signal; so that the total lighting power of non-excluded spaces can be lowered by a minimum of 15 percent below the total installed lighting power when a Demand Response Signal is received. Lighting shall be reduced in a manner consistent with uniform level of illumination requirements in TABLE 130.1-A.
 - These controls are not required if the area of all altered enclosed spaces is 10,000 square feet or less. This is clarified in the CEC Blueprint Newsletter.

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