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Additional submitted attachment is included below.

July 19, 2017

Submitted via email: <https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=17-BSTD-01>

Mr. Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Philips Lighting Comments on the Draft CASE Report (June 2017) NR Outdoor Controls for the 2019 California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 6

Dear Commissioner McAllister,

Philips Lighting appreciates the opportunity to provide the attached comments on the Draft CASE Reports of June 2017 for the Nonresidential Lighting provisions of the 2019 California Building Energy Efficiency Standards California Code of Regulations, Title 24, Part 6. We also send our thanks to the California Energy Commission and recognize the CEC's efforts as well as that of the CA IOUs and consultants to involve industry in the development of the CASE Reports.

Philips Lighting is a global leader in lighting products, systems and services. Our understanding of how lighting positively affects people coupled with our deep technological know-how enable us to deliver digital lighting innovations that unlock new business value, deliver rich user experiences and help to improve lives. Serving professional and consumer markets, we sell more energy efficient LED lighting than any other company. We lead the industry in connected lighting systems and services, leveraging the Internet of Things to take light beyond illumination and transform homes, buildings and urban spaces.

Please contact me if you have any questions about these comments.

Sincerely,



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Proposal to Update Definitions

We support the updating of definitions for Title 24 Part 6 2019 and thank the CEC and the Statewide CASE Team for their efforts to complete this important task. Reviewing definitions in each code cycle ensures that the definitions are up to date and relevant to current technology and practice. Consistent, clear definitions within Title 24 are very important to all users of the code as well as to industry. For this reason, we strongly favor the use of the same terminology and definitions across Title 20 and Title 24 as well the use of applicable ANSI and IESNA definitions as a matter of policy.

Proposal to Decrease Wattage of Lighting Grouped Together on an Occupancy-Based Control from 1500W to 400W [Section 130.2(c)]

We are not in favor of reducing the amount of lighting power allowed to be grouped together on an occupancy-based control from 1,500 watts to 400 watts. We believe this reduction would have a significant negative impact on the market adoption and installation of site-wide, highly efficient, connected outdoor lighting systems that have integrated sensing and control functionality. In a site-wide integrated lighting system, the occupancy-based control for each luminaire group would be a matter of programming and execution by the system. The system would establish the appropriate light levels, zoning, energy consumption, etc. based on the inputs provided.

Limiting the control zone also puts single use sites that may only have one big lot for instance at a disadvantage because in that scenario multiple control zones in one lot wouldn't serve a purpose beyond adding cost and complexity and likely wouldn't be outweighed by the savings that multiple controls zones provides. In addition, we think an amount of flexibility is desirable to provide for projects that fall just over the square foot threshold.

In 2020 when the 2019 Building Energy Efficiency Standards become effective we expect there will be many site-wide outdoor lighting systems in use and many less solitary luminaires with controls. We anticipate that neither a wattage limit nor an area limit for occupancy-based control will be necessary as the market moves beyond traditional implementations of controls. The control requirements already in place within the code ensure energy savings levels. The 15,000 sq. ft. maximum area was more appropriate a number of years ago when occupancy-based control meant a specific coverage area per control device and strictly non-communicating luminaires. We urge the Statewide CASE Team to consider this proposal further and explore what limits might be necessary for controls functionality in the 2019 Building Energy Efficiency Standards.

Proposal to align with ASHRAE 90.1-2016

We support alignment requirements and language with ANSI/ASHRAE/IES 90.1-2016 including the adoption of a default midnight to 6am schedule for automatic time switches controls when the schedule is unknown, a 15-minute maximum vacancy period for motion sensors, and increasing the minimum dimming amount from 40% to 50%. We commend the Statewide CASE Report Team on the alignment of language with ANSI/ASHRAE/IES 90.1-2016, as it will benefit all users of the code.



Proposal to create a new option for ‘Tri-Level’ Occupancy-based Controls [proposed new Section 130.2(c)2Cii]

We support the inclusion of an option for occupancy-based controls in which the timing signal is used to reset the dimming level when no occupancy is detected and agree with the Statewide CASE Team’s position that there may be less safety and/or liability concerns with this methodology.

Thank you for your consideration of Philips Lighting Comments on the Draft CASE Report (June 2017) NR Outdoor Controls for the 2019 California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 6.