

DOCKETED

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Philips Lighting Comments on draft CASE Report NR Alterations

Additional submitted attachment is included below.

July 19, 2017

Submitted via website: <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

Docket No.: 17-BSTD-01

Philips Lighting Comments on the Draft CASE Report (June 2017) NR Alterations 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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With regard to the two proposals for Nonresidential Lighting Alterations, we believe that both proposals have merit, but it is our opinion that the CASE Report proposal does little to address the complexity of the existing alterations language, which is an ongoing complaint.

The CEA proposal on the other hand, offers a single category for all Alterations for Lighting Systems, and the potentially confusing language for wiring alterations requirements has been removed. The proposal features a single table for all the requirements, as opposed to three tables in the CASE Report proposal. In addition, we believe that the LPA threshold of 80% and the single power level threshold of 40% for Option 3 in the CEA proposal are more in line with LED baselines. However, neither proposal addresses the need for verification of existing power loads, which we believe is essential to prevent skirting of requirements.

We also support the 5,000 sq. ft. limit for Option 3 because it supports the type of projects this option was originally intended to promote; larger projects should have more limited options for compliance.

One area where we do agree with the CASE Report proposal is that it is time to address lighting reductions in stairwells through Partial-Off Occupancy sensors, as this opportunity for additional energy savings seems to have been overlooked in the current code.

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