

DOCKETED

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Comment Received From: John Martin

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CEA Comment on Demand Response

Additional submitted attachment is included below.

July 28, 2017

California Energy Commission
Docket No. 17-BSTD-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

The following comments represent the views of the California Energy Alliance (CEA) on the important energy code issue of automated demand-response (ADR) capability in non-residential buildings.

To improve non-residential lighting standards under Title 24 for 2019, we urge the Commission to adopt proposals that will mandate installation of equipment in non-residential buildings and spaces over 10,000 square feet in area (regardless of lighting power allowance in the space) that can receive and respond to ADR signals. California utilities use OpenADR 2.0a or later; some lighting equipment uses these protocols and some may use BACnet. Therefore, we believe the requirement should be for a gateway that receives an OpenADR signal and can communicate with either OpenADR or premises equipment using other protocols. After receiving the signal, the lighting power should be changed from the then current lighting power consumption. That is, for example, if the lights are already at 85% of total installed power, they should be further reduced. The total percentage change would be negotiated between utilities and their customers. We note that future ADR events may require a temporary increase in power consumption in order to balance grid loads.

The ADR controls should include at least 75% of the building's installed lighting power, to allow for minor non-controlled areas such as closets, storerooms and utility areas. We believe this important goal can be achieved in an economical and straightforward manner using equipment that is accessory to the lighting system.

We also recommend that the Commission adopt language extending similar ADR capability and load reduction levels to a minimum of 75% of a building's exterior lighting load (e.g., parking areas, facades, and path lighting).

Incorporating these recommendations in the 2019 version of Title 24 will correct an inadvertent oversight in the 2016 code, which requires ADR capability but does not require installation of ADR receiving equipment useful to utilities and grid operators.

Thank you.

Sincerely,

A handwritten signature in black ink that reads "John Martin". The signature is written in a cursive style with a large, stylized "J" and "M".

John Martin

Co-Chair, California Energy Alliance

cc: Payam.Bozorgchami@energy.ca.gov, Thao.Chau@energy.ca.gov, Gabriel.Taylor@energy.ca.gov, Peter.Strait@energy.ca.gov