

## DOCKETED

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<b>Project Title:</b>	2019 Building Energy Efficiency Standards PreRulemaking
<b>TN #:</b>	221513
<b>Document Title:</b>	Robert A. Shearer Comments Pre-Rulemaking 2019 Nonresidential Appendices Section NA 7.6.2.3 Incorrect Change to Code Language
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<b>Organization:</b>	Robert A. Shearer
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*Comment Received From: Robert A. Shearer*

*Submitted On: 10/16/2017*

*Docket Number: 17-BSTD-01*

**Pre-Rulemaking 2019 Nonresidential Appendices Section NA 7.6.2.3: Incorrect Change to Code Language**

*Additional submitted attachment is included below.*

Oct 15th, 2017

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**Re: Docket # 17-BSTD-01**  
**Pre-Rulemaking 2019 Nonresidential Appendices Section NA 7.6.2.3: Incorrect  
change to Code Language (Editing Error)**

***INTRODUCTION:***

A change in the specification to add sampling for Indoor Occupancy Sensing Devices is *incorrect*. This appears to be a simple “typo” caused by a “Cut-and-Paste” error.

***ABSTRACT:***

Acceptance Test Technicians must complete Acceptance Testing, (“NRCA”), Certificates in an honest, repeatable, and verifiable manner: Sections NA7.6, NA7.7, and NA7.8 *should* accurately reflect the Acceptance Test criteria; even if just in the broadest terms.

***THE ARGUMENT:***

The sampling criterion for “occupancy sensors” should be based on the number of “occupancy sensors” installed.

***THE BAD LANGUAGE:***

***NA7.6.2.3 Occupancy Sensing Lighting Control Functional testing***

For buildings with up to seven (7) occupancy sensors, all occupancy sensors shall be tested. For buildings with more than seven (7) occupancy sensors, sampling may be done on spaces with similar sensors and space geometries; sampling shall include a minimum of 1 occupancy sensor for each group of up to 7 additional ~~photocontrols~~ occupancy sensors. If the first occupancy sensor in the sample group passes the acceptance test, the remaining building spaces in the sample group also pass. If the first occupancy sensor in the sample group fails the acceptance test the rest of the occupancy sensors in that group must be tested. If any tested occupancy sensor fails it shall be repaired, replaced or adjusted until it passes the test.

Thank You,

Robert A. Shearer, BSEE

Oct 15th, 2017

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**Re: Docket # 17-BSTD-01**  
**Pre-Rulemaking 2019 Nonresidential Appendices Section NA7 Draft Document**  
**Footer and Header Mismatch (Editing Error)**

**INTRODUCTION:**

A page formatting error has occurred in: "Draft 2019 Standards Nonresidential Appendices" docketed to 17-BSTD-01; TN# 221271; Posted 9/20/2017.

**ABSTRACT:**

The Header Page numbers refer to section NA8. The Footers appear to be correct.

**THE ARGUMENT:**

Here is a screen shot of a page footer and next page header.

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*Appendix NA7– Installation and Acceptance Requirements for Nonresidential Buildings and Covered Processes*

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*Appendix NA8-28*  
**NA7.6.2.3**

*2019 Nonresidential Appendices*  
**Occupancy Sensing Lighting Control Functional testing**

Thank You,

Robert A. Shearer, BSEE

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**Re: Docket # 17-BSTD-01**  
**Pre-Rulemaking 2019 Nonresidential Appendices Section NA7.8.2 Motion**  
**Sensor Functional testing: (Possible Time-out Error)**

***INTRODUCTION:***

A change in the Building Energy Efficiency Standards Section 110.9 *and* the current Outdoor Lighting Acceptance Testing form would be required to reconcile the 30-minute Time-Out shown in NA7.8 for Outdoor Motion Sensors.

***ABSTRACT:***

Section 110.9 and the current "NRCA" form show a 20-minute Time-Out.

***THE ARGUMENT:***

The code documents and forms should be reconciled throughout.

***THE (POSSIBLY) BAD LANGUAGE:***

**NA7.8.2 Motion Sensor Functional testing**

Step 2: Simulate no motion in area with lighting controlled by the sensor.

Verify and document the following:

(a) Lights controlled by the sensor reduces light output within a maximum of ~~30~~ 20 minutes from the start of an unoccupied condition.

Thank You,

Robert A. Shearer, BSEE

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**Re: Docket # 17-BSTD-01**  
**Pre-Rulemaking 2019 Building Energy Efficiency Standards Section 130.1 (a) 2.:**  
**Incorrect change to Code Language (Safety Concern)**

***INTRODUCTION:***

A change in the exceptions to placing an Area-Control in a Readily Accessible location within the area containing the controlled lighting has been modified.

***ABSTRACT:***

The exception, (EXCEPTION 2 to Section 130.1(a)2:), no longer excludes: Corridors, Stairwells, and Parking Garage Areas – forcing Readily Accessible Area-Controls to be located within these areas.

***THE ARGUMENT:***

This existed in the 2013 code and was corrected for the 2016 code. In the authors' opinion, removing these exceptions is unsafe.

***THE BAD LANGUAGE:***

EXCEPTION 2 to Section 130.1(a)2: In healthcare facilities, for restrooms and bathing rooms intended for a single occupant, the lighting control may be located outside the enclosed area but directly adjacent to the door.

It is suggested that: "parking areas, stairwells, and corridors may use a manual control not accessible to unauthorized personnel"; or words to this effect, should be inserted into EXCEPTION 1.

Thank You,

Robert A. Shearer, BSEE

Oct 15th, 2017

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**Re: Docket # 17-BSTD-01**  
**Pre-Rulemaking 2019 Building Energy Efficiency Standards Section 130.1 (b):**  
**Change to Code Language (Retrofit Contractors and Safety Concern)**

***INTRODUCTION:***

A change in the exceptions requiring Multi-Level Area Controls in Corridors, Stairwell, and Parking Garage Parking Areas has been noted.

***ABSTRACT:***

The exception, (EXCEPTION 3 to Section 130.1(b)) no longer excludes: Corridors, Stairwells, and Parking Garage Areas – forcing Manual Multi-Level Control for Controlled Lighting in these areas.

***THE ARGUMENT:***

This existed in the 2013 code and was corrected for the 2016 code. In the authors' opinion, removing these exceptions is going to go hard on contractors who wish to retrofit the luminaires in these areas and use controls situated adjacent to the luminaires. Instead, extensive wiring, (or wireless controls), will be required to place the luminaires under manual dimming control. This seems out of character for these areas – and may lead to an unsafe illumination level.

***THE BAD LANGUAGE:***

~~EXCEPTION 3 to Section 130.1(b): The areas specified in Sections 130.1(e)6 and 7 are not also required to meet the requirements of Section 130.1(b).~~

It is suggested that; in any nonresidential function areas which require lighting levels for safety, or within which a reasonable person would not expect continuous dimming to be utilized on a frequent basis, Section 130.1 (b) – (and therefore Table 130.1-A) – need not apply.

Thank You,

Robert A. Shearer, BSEE