

DOCKETED

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Section 130.4 (a) Underground Standard 2019 Draft Building Energy Efficiency Standards

Additional submitted attachment is included below.

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Re: Docket # 17-BSTD-01
Pre-Rulemaking 2019 Building Energy Efficiency Standards Section 130.4:
Underground Standard

INTRODUCTION:

No legal requirement for Acceptance Testing exists in Section 130.4 (a) regarding:

Occupant Sensing Control Controlling the General Lighting in Large Open Plan Office Areas Above Workstations

And ...

Daylight Dimming plus OFF

Power Adjustment Factors.

ABSTRACT:

A problem exists within the Building Energy Standards which can readily cause confusion as to whether or not certain PAFs, (Power Adjustment Factors), actually require Acceptance Testing. Section 130.4 (a) contains the "Thou Shalt Acceptance Test" requirements. Two PAFs that appear on the Acceptance Testing Certificates do not appear in this section, while one PAF does.

This ...

Section 130.4 (a)

7. Certifies that lighting systems receiving the Institutional Tuning Power Adjustment Factor comply with Section 140.6(a)2J and Reference Nonresidential Appendix NA7.7.6.2.

... clearly states that the new (2016) Institutional Tuning PAF must undergo acceptance testing. However, no such code exists for two other PAFs found on the Certificates of Acceptance:

140.6 (a) 2. H. "daylight dimming plus OFF"

140.6 (a) 2. I. "occupant sensing control(s) ... in large open plan office areas ..."

THE ARGUMENT:

“140.6 (a) 2. I. “occupant sensing control(s) ... in large open plan office areas ...” “must be” Acceptance Tested by a Field Technician based ONLY ON a test appearing on NRCA-LTI-02-A. This test appears, (virtually), in Section NA7.7 ... but this Reference Appendix section relates to Systems, EMCS and PAFs.

Section NA7.7 is devoted to *INSTALLATION INSPECTIONS* to fill out “NRCI Forms”. In this capacity: Section NA7.7 is not equivalent to Section NA7.6. Therefore; the Legal Requirement to perform Acceptance Tests on Power Adjustment Factors must be specified in Section 130.4 (a).

In a similar circumstance: 140.6 (a) 2. H. “daylight dimming plus OFF” also lacks an Acceptance Testing requirement in 130.4 (a).

THE BAD LANGUAGE:

7. Certifies that lighting systems receiving the Institutional Tuning Power Adjustment Factor comply with Section 140.6(a)2J and Reference Nonresidential Appendix NA7.7.6.2.

... Is the *ONLY* PAF shown to require, (*Legally* Require), Acceptance Testing in Section 130.4 (a)

Proposed solution:

The lack of a firm legal requirement for Acceptance Testing of the two PAFs in question can be remedied by appending these two lines of code to section 130.4 (a):

8. Certifies that lighting systems receiving the Daylight Dimming plus OFF Power Adjustment Factor comply with Section 140.6(a)2H and Reference Nonresidential Appendix NA7.6.1.2.1 (e) 3.

9. Certifies that lighting systems receiving the Occupant Sensing Control Controlling the General Lighting in Large Open Plan Office Areas Above Workstations Power Adjustment Factor comply with Section 140.6(a)2I and Reference Nonresidential Appendix NA7.7.6.1

Thank You,

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