

DOCKETED

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Filer:	Adrian Ownby
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October 26, 2017

California Energy Commission
1516 9th Street
Sacramento, CA 95814
Attn: Docket Office (MS-4)

**Re: Draft 2019 Building Energy Efficiency Standards,
Docket No. 17-BSTD-01**

Dear Commissioner McAllister and Energy Commission Staff,

The California Building Officials (CALBO) appreciates the opportunity to provide comments and feedback on the California Energy Commission's Draft 2019 Building Energy Efficiency Standards. CALBO advocates for local California Building Officials, local building departments, local government entities, and public safety and code enforcement officials. Our comments are as follows.

Index and Formatting.

In an effort to simplify the California Energy Code and to improve compliance, CALBO supports the inclusion of an index and consistent formatting as required by California Health and Safety Code.

Cal. Health & Safety Code §18930

(8) The format of the proposed building standards is consistent with that adopted by the commission.

Cal. Health & Safety Code §18932.

(b) The code shall include an index and reference guide.

(c) The commission shall establish the format for the code to conform it as nearly as it deems practicable with the model codes.

Administrative Regulations.

Administrative regulations and definitions that are currently located in Title 24, Part 1 (California Administrative Code), Chapter 10, that include requirements that fall under the purview of the local code official should be relocated into Title 24, Part 6. There are administrative regulations in Title 24 Part 1 that code officials are responsible for enforcing. These regulations should be included in Part 6, specifically 10-101, 10-102, 10-103 (excluding 10-103.1 and 10-103.2), Table 10-114-A and the new proposed language found in 10-115.

Many building inspectors and plans examiner do not have Part 1 so these code requirements are not readily available to them.

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CITY OF MANTEDA

Recessed Downlights Luminaires in Ceilings.

The current and proposed Standards include a prohibition of recessed luminaires that contain screw base sockets. The big box stores sell recessed housings that come with screw base sockets. They also sell LED trim kits that are manufactured specifically for use in these recessed housings. These recessed housings and LED trim kits that meet the intent of the Energy Code should be allowed if used in conjunction with each other. Unlike LED bulbs the trim kits eliminate the possibility of premature failure due to heat build-up. Furthermore the LED trim kits should be encouraged as a retrofit option for existing recessed housings.

Respectfully submitted by

A handwritten signature in black ink, appearing to read 'G. Mahoney', written in a cursive style.

Gregory Mahoney, CBO
Chair, CALBO Energy Advisory Committee