

## DOCKETED

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<b>Project Title:</b>	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
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<b>Document Title:</b>	AccurIC Ltd Comments On Draft 2019 Building Energy Efficiency Standards
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*Comment Received From: AccurIC Ltd*

*Submitted On: 2/5/2018*

*Docket Number: 17-BSTD-02*

## **On Draft 2019 Building Energy Efficiency Standards**

*Additional submitted attachment is included below.*

**From:** Dave Bannister (AccurIC Ltd)  
**To:** [Energy - Docket Optical System](#); [Bozorgchami.Payam@Energy](mailto:Bozorgchami.Payam@Energy)  
**Subject:** 17-BSTD-02: Draft 2019 Building Energy Efficiency Standards  
**Date:** Monday, February 05, 2018 9:00:21 AM

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Dear California Energy Commission,

Having read the sections of the 45-day Express Terms 2019 Standards JA 8 document (17-BSTD-02) relating to flicker I would very much like to pass on AccurIC's thanks and appreciation for your efforts, both in terms of ensuring that Joint Appendix 8 remains in line with peer-reviewed research and in taking full account of the inputs that have been made to the Title 24 process. It remains imperative in our view, that the tests and test procedures outlined in Joint Appendix 10, as referenced by Joint Appendix 8, remain unchanged. Future updates should, in our view, only be made to the levels of flicker allowed from qualifying products, with the obvious assumption being that such updates will be downwards, and apply over a wider range of frequencies. The use of JA 10 will ensure that all products are tested in accordance with the same procedure, using the same metrics and that these metrics and procedures are traceable to independently peer-reviewed research. It will further ensure that any future broadening of the frequency-range over which maximum acceptable flicker levels are defined is supported by traceable performance data, together with peer-reviewed research.

Best regards,

Dave

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On 2017-11-22 20:20, Dave Bannister (AccurIC Ltd) wrote:

Dear California Energy Commission,

Please accept the attached as the considered response of AccurIC Ltd, to the consultation on the Draft 2019 Building Energy Efficiency Standards and in particular, to the Joint Appendices relating to quality standards for low energy lighting.

Please acknowledge receipt of this email and its attachment.

Best regards,

Dave

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