

## DOCKETED

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*Comment Received From: Cori Jackson*

*Submitted On: 2/20/2018*

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**CEA comments on Draft Express Terms - Section 141.0(b)2I**

*Additional submitted attachment is included below.*



February 20, 2018

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Re: Docket 17-BSTD-02, 2019 Building Energy Efficiency Standards 45 Day Language, §141.0(b)2I

The California Energy Alliance (CEA) has reviewed the Energy Commission's Draft Express Terms for the 2019 Building Energy Efficiency Standards. Generally, the CEA supports the proposed language and believes the language is shorter, simpler to understand, and will improve compliance and energy savings for California.

As contained in the CEA's code change proposal on simplified lighting alterations submitted to the Energy Commission in 2017, the CEA does not support continued inclusion of a 70-luminaire exemption per building floor, per year, for one-for-one luminaire alterations (Exception 6 to Section 141.0(b)2I). This limit allows approximately 3500 to 7000 square feet of building stock, per building – per floor - per year, to avoid code compliance and proceed with unregulated lighting alterations. The CEA asks that the Energy Commission revisit the CEA's code change proposal, and reference the CEA's documentation regarding reducing this exemption to 50 luminaires or less. This change will align the proposed code with the CEA's other recommended measures (which have been adopted under the Draft Express Terms), and eliminate potential confusion and contradictions in the language. By reducing this exemption, we would be reducing the loop holes used to avoid compliance, and increasing the amount of building stock benefiting from energy saving alterations.

Assuming the 70-luminaire loophole is addressed and reduced per the CEA's recommendations, the CEA supports the revised lighting control requirements contained in Section 141.0(b)2.I, as detailed under Table 141.0-E *Control Requirements for Indoor Lighting System Alterations*. This includes the proposed changes to use of multilevel lighting controls and occupancy controls for alterations complying under Section 141.0(b)2I.ii (80 percent or less LPD compliance pathway) or Section 141.0(b)2I.iii (input power method of compliance). The CEA believes that the combination of its proposed reduction to the annual luminaire exemption coupled with the proposed lighting control requirements contained in Table 141.0-E creates a simple set of requirements that will increase the rate of lighting system alterations in California, improve compliance and increase overall energy and carbon savings.

Regards,

A handwritten signature in blue ink that reads "Cori Jackson".

Cori Jackson

California Energy Alliance