

## DOCKETED

<b>Docket Number:</b>	17-BSTD-02
<b>Project Title:</b>	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
<b>TN #:</b>	222849
<b>Document Title:</b>	Legrand Comments In Support of Utility Case Team Topics
<b>Description:</b>	N/A
<b>Filer:</b>	Chester Hong
<b>Organization:</b>	Legrand
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/5/2018 2:03:58 PM
<b>Docketed Date:</b>	3/5/2018



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March 5, 2018

California Energy Commission  
Commissioner Andrew McAllister  
Docket No. 17-BTSD-02  
Docket Unit: MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

**RE: Docket No. 17-BTSD-02 – Comments in Support of Utility CASE Team Topics, Docketed 2/21/2018, TN # 222626**

Legrand, especially its California based Wattstopper lighting control brand, appreciates the opportunity to submit comment for the Title 24 Standard's process. We acknowledge the significant work put forward by all proposal teams, commission staff, commission consultants and other contributors to improve the energy efficiency and applicability of the Title 24 lighting and lighting control related sections.

With our many years of lighting controls industry experience, Legrand submits our remarks in support of comments put forward by the Statewide Utility Codes and Standards Team Comments on Lighting Topics, docketed on February 20, 2018, TN # 222626.

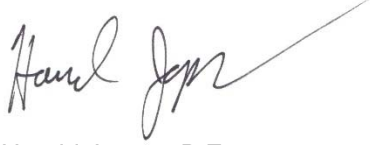
**Outdoor Lighting Controls – SECTION 130.2**

Having been removed under the Express Terms, the 45-Day Language re-instated the provision for Motion Sensing Controls under 130.2 (c) 3. This re-instatement is a positive return toward outdoor lighting efficiency, as it has been under the 2013 and 2016 standard versions. However, the language re-instatement did not sufficiently include scheduling control, or properly limit the motion control zone wattage size. Both of these provisions should be put back into the standard to uphold energy efficiency and to maintain code stringency. The 45-Day language can additionally be improved in clarifying the outdoor control requirement functionality.

We believe the language proposed by the Utility CASE team under TN #222626 restores outdoor lighting control efficiency, and more directly defines the applying requirements for compliance. We urge the Commission to adopt the CASE Team language in the 15-Day Language.

Legrand appreciates the opportunity to be part of the open energy efficiency standards development process and invites further dialogue where we can participate in achieving California's energy efficiency goals together.

Best Regards,

A handwritten signature in black ink, appearing to read 'Harold Jepsen', with a long, sweeping horizontal line extending to the right.

Harold Jepsen P.E.  
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