

DOCKETED

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NRDC Supplemental Comments on 45 Day Language for Title 24 2019

Additional submitted attachment is included below.



March 14, 2017

NRDC Supplemental Comments on 45 Day Language for Title 24 2019 Update - Docket No. 17-BSTD-02

On behalf of the Natural Resources Defense Council (NRDC), we submit these supplemental comments on the Commission's 45 Day Language for the Title 24 2019 Update.

Since we submitted our written comments, we have learned that the proposed language that covers Controls on Outdoor Lighting removes a portion of the requirements for scheduling controls, which has been part of the code since 2013. Its removal puts some of the sizable statewide energy savings from State required advanced light controls at risk.

We encourage the Commission to review the [comments](#) submitted by the Statewide Codes and Standards program and to adopt their recommendation to restore the stringency of the building energy code by requiring all three controls (daytime, scheduling and vacancy) for those applications that have required vacancy controls in the past. We also want to point out that:

- This proposal has the support of leading manufacturers including Philips Lighting and Wattstopper who previously submitted comments to the docket; and
- There does not appear to be any opposition to this proposal from any public stakeholder.

Thank you for considering this request.

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