

DOCKETED

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on the 2019 Title 24 Part 6 Building Energy Efficiency Standards

Additional submitted attachment is included below.

May 2, 2018

Submitted via: <https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=17-BSTD-02>

Mr. Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Re: Docket No. 17-BSTD-02

Lutron Electronics Co., Inc. Comments on the 2019 Title 24 Part 6 Building Energy Efficiency Standards Revised Express Terms 15-Day Language

Dear Commissioner McAllister,

Thank you for the opportunity to review and provide comments on the 2019 Title 24 Part 6. These comments are submitted on behalf of Lutron Electronics Co., Inc.

As you may know, Lutron was founded in 1961 and is headquartered in Coopersburg, Pennsylvania. From dimmers for the home, to lighting management systems for entire buildings, the company offers more than 17,000 energy-saving products, sold in more than 100 countries around the world. In the U.S. alone, Lutron products save an estimated 10 billion kWh of electricity, or approximately \$1 billion in utility costs per year. The company's early inventions— including the first solid-state dimmer invented by Lutron's founder, Joel Spira—are now at the Smithsonian's National Museum of American History in Washington, DC.

Please find our detailed comments below. We look forward to working with you further on this important project. Please contact Michael Jouaneh at 610-282-5350 or mjouaneh@lutron.com if you have questions or would like more information on these comments. Thanks again for your consideration.

Respectfully submitted,



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All in all, we are pleased with the revisions to the Title 24 Part 6 Standards except for some issues noted below.

We would like to thank the Energy Commission for working with industry and other stakeholders during the 2019 rulemaking. And we appreciate the staff's hard work and willingness to work with us to address our questions and concerns.

The comments and suggested edits to the proposed 2019 Title 24 Part 6 Building Energy Efficiency Standards Revised Express Terms 15-Day Language are shown below. Edits are shown in ~~strikeout~~ (for deletions) and underlining (for additions):

Chapter 2-110

1. Section 110.12 Mandatory Requirements for Demand Management.

Lutron comments: See suggested changes and rationale below.

Changes:

(a) Demand responsive controls.

~~2. All demand responsive controls shall be capable of communicating using one or more of the following: Wi-Fi, ZigBee, BACnet, Ethernet, or hard wiring.~~

23. Demand responsive controls may incorporate and use additional protocols beyond those specified in Sections 110.12(a)1 and 2.

Rationale:

- This language is too prescriptive and confusing. Some may interpret the language as requiring certain communication protocols on devices that are part of the lighting control system downstream of the VEN. Ideally, we would like this language removed per above but if that's not doable perhaps the Compliance Manual can explain that devices that are part of the system downstream of the VEN can use any communication protocol as long as the system is able to respond to an OpenADR 2.0a or 2.0b communication signal. We urge the Commission to not specify the communication protocols that are internal to the demand responsive systems, which would have the effect of limiting innovation and limiting competition. For example, various industry groups are developing such standards as Thread, Bluetooth Low Energy, and others. There is no reason to believe that others won't come up in the future.

Chapter 4-130

2. Section 130.0(c). Luminaire classification and power.

Lutron comments: We support the changes made to this section as the language is much clearer than before. We believe that a table with images of different types of luminaires and how to account for their lighting power would be a nice addition to the Compliance Manual so that lighting power is always calculated the same for each type of luminaire. We are happy to work with staff to help provide this table to further reduce ambiguities and inconsistencies that may arise.

3. Section 130.1(f) Control Interactions.

Lutron comments: We support the modifications made to this section as they add clarity to how multiple lighting controls should interact in a space.

Chapter 6-141

4. Section 141.0(b)2l. Altered Indoor Lighting Systems.

Lutron comments: We support the changes which simplify and clarify lighting control requirements for alterations while increasing energy efficiency by bringing back key provisions for energy saving lighting controls.

Chapter 7-150

5. Section 150.0(k)2l Interior Lighting Switching Devices and Controls.

Lutron comments: Suggested changes and rationale below.

Changes:

I. In bathrooms, garages, laundry rooms, and utility rooms, at least one luminaire in each of these spaces shall be controlled by an occupant or vacancy sensor providing automatic-off functionality. If an occupant sensor is installed, it shall be initially configured to manual operation ~~using the manual control required under Section 150.0(k)2C.~~

Rationale:

- Please strike “using the manual control required under Section 150.0(k)2C” as it can be interpreted to mean that the sensor configuration must be done by the manual control, yet the sensor itself can also be the manual control. Alternatively, this language can be clarified in the Compliance Manual.