

**DOCKETED**

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**IALD Comments on 2022 version of Title 24**

*Additional submitted attachment is included below.*

2 April 2020

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Docket # 19-BSTD-03

*Submitted via electronic comment system*

Dear Commissioners,

On behalf of the International Association of Lighting Designers (IALD), we are pleased to submit the following comments regarding the 2022 version of Title 24.

The IALD is the leading global organization of architectural lighting designers. Lighting designers are a tremendous resource for innovative, practical and economically viable lighting solutions. They understand the role of lighting in architecture and interior design and rely on their extensive experience and knowledge of lighting equipment and systems to enhance and strengthen design. IALD member lighting designers are uniquely qualified to bridge the gap between technical regulations and aesthetic considerations while remaining committed to lighting quality for occupants of the built environment.

IALD currently has over 170 members residing in California and many of our members outside of the state accept California-based projects. These lighting

designers set a standard of exemplary dedication and engagement to the organization that help make IALD hold a position of distinction and authority in the lighting design profession.

IALD appreciates the opportunity to offer these comments and asks that the CEC take them into serious consideration. We recognize all that the Commission does to acknowledge that electric energy is essential to the health, safety, and well-being of constituents operating in the built environment.

We urge the California Energy Commission to consider the following proposal:

### **Nonresidential Indoor Lighting:**

1. We ask that the code be re-written so that dimmers are not required for all interior spaces. This requirement is too broad and, in many cases, unnecessary. An example of this is undercabinet lights in kitchens. The IALD supports the intent behind dimming requirements, however, lighting layers such as undercabinet lighting are not likely to prove energy saving targets.
2. Red Green Blue White (RGBW) fixtures cannot be used for general lighting. Despite their use in interior spaces, such as showers, saunas and entertainment rooms, current RGBW fixtures are not meeting the code for high efficacy. For RGBW fixtures to be used for general lighting, lighting

designers must add another set of white light in order to meet the high efficacy requirement. It contradicts the promotion of high efficacy fixtures and uses more energy than necessary.

3. The tunable lighting allowance should be revised so it should not restrict luminaire aperture size. Currently the 0.75 power adjustment factor only applies to 4" or smaller aperture fixtures. There are some 6" diameter tunable white downlights which would be helpful to also have this power adjustment factor apply.

#### **Nonresidential Outdoor Lighting:**

4. We ask that a "lighting control specialist" be a requirement within the code to ensure that nighttime control schedules on outdoor lighting sites are programmed according to code requirements.
5. We recommend that nonresidential outdoor lighting controls requirements incorporate provisions for emergency situations, such as earthquakes, where full output, uninterrupted illumination of outdoor space is provided.
6. Title 24 light trespass requirements (part 6 and/or 11) create illumination dead zones between properties. IALD asks the CEC to consider modifications in a similar fashion to the LEED standard. LEED has adopted a model in which "campuses" can have light trespass, as project boundaries are directly tied to public right of way sidewalks, in which light spill is important to safety.

**Joint Appendix 8 (JA-8):**

Lighting quality is central to our members' work; however, there is concern among lighting practitioners that Joint Appendix 8 (JA-8) makes achieving this goal difficult. We ask that as you approach possible modifications to JA-8, you consider how they may impact the lighting quality. Therefore, we ask that you find solutions that strike a balance that adheres to compliance without compromising creative design or access to affordable product.

7. JA-8 makes achieving lighting quality and energy efficiency difficult as timelines and product costs to achieve compliance are difficult for manufacturers as they work against the ever-shrinking design and construction timelines of the industry. We ask that the CEC continue to allow older products to be accepted in the 2022 version of Title 24, much like JA-8 2016 products are accepted in the 2019 standard. If products do not need to be re-marked, the inventory that remains in stock at year's end will still be allowed for new residential construction, giving lighting practitioners access to higher efficacy merchandise.
8. Under the current process, lighting designers have a difficult time accessing JA-8 certified products. IALD asks the CEC to consider alternative options that

could alleviate the current situation and offers the global perspective of our members as a resource during these forthcoming deliberations.

Over the last few years, IALD has offered comments and recommendations to the CEC as you further your work. Moving forward, we hope that our members, who have an extensive knowledge of lighting quality and energy efficiency, can continue to have input when considering lighting standards for California.

With that in mind, we hope to see future Title 24 standards continue to reward quality lighting design. We also ask that as the CEC updates current standards that you also consider incentives for new technology that support advanced lighting systems. And, lastly, we ask that the CEC's approach to cost effectiveness be reevaluated with LED as the baseline. Because the market has shifted to solid state lighting (SSL) technology, energy-savings with SSL technologies are at a maximum.

Thank you for your consideration. We look forward to partnering with you throughout the process. If you have any questions, please contact Emily Bowers, Sr. Coordinator, Public Policy ([emily@iald.org](mailto:emily@iald.org)).