

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	235393
Document Title:	Charles Knuffke Comments - Comments on 2022 Pre-Rulemaking
Description:	N/A
Filer:	System
Organization:	Charles Knuffke
Submitter Role:	Public
Submission Date:	10/22/2020 1:02:09 PM
Docketed Date:	10/22/2020

Comment Received From: Charles Knuffke
Submitted On: 10/22/2020
Docket Number: 19-BSTD-03

Comments on 2022 Pre-Rulemaking

Additional submitted attachment is included below.

October 22, 2020

California Energy Commission
Commissioner Andrew McAllister
Docket No. 19-BTSD-03
Docket Unit: MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket No. 19-BTSD-03 - Comments on 2022 Title 24 Part 6 Energy Code Pre-Rulemaking

Legrand, especially its California based Wattstopper lighting control brand, appreciates this opportunity to submit comments on the information provided so far on the 2022 Title 24 Standard. We gratefully 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. The below comments add to the ones we provided directly to the CEC during the Pre-rulemaking Draft Express Terms workshop on October 7.

NonRes Grid Integration Case Report

From the NonRes Grid Integration case report (p76 & 77), both Section 140.6(a)2.K and Table 140.6-A should not constrain the PAF to “general lighting wattage” or “General lighting luminaires” but should just say “lighting wattage” and “Lighting not in scope”.

Section 110.9 – Mandatory Requirements for Lighting Controls

In the Non-Residential Daylighting Case Report (p73), Exception to Section 130.1(d)2 – indicates that sources shall be treated as lamps in increments of 2 feet and segmented within one foot of the edge of each type of daylight zone. This recommendation would be a nightmare for a manufacturer to plan and circuit since longer linear fixtures are usually defined in 4 foot increments. Our recommendation would be to use an increment of 4 feet.

If there is anything in the above portion this letter where the CEC finds our concerns or proposals unclear, we hope that you’ll consider contacting us for clarifications. We’ve certainly enjoyed the opportunities we’ve had in the past to discuss the Energy Code language.

Respectfully Submitted,

A handwritten signature in black ink that reads 'C. Knuffke'. The signature is written in a cursive style with a large, looped 'C' and a long, sweeping tail for the 'k'.

Charles Knuffke
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