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Express Terms 2022 NLCAA Comment - 15 day

Additional submitted attachment is included below.



NLCAA appreciates the opportunity to support with the CEC in the effort to create a synergy between the energy codes and the compliance documents. Having worked with these documents since 2014 NLCAA as have found that the ATTCPs, ATTs and ATEs can provide an invaluable look into how these documents are interpreted, misinterpreted, understood, or even misused, by many different professionals using the energy codes.

The following are NLCAA's comments on the Express Terms (15-Day Language):

1. NA7.6.1.1 Construction Inspection

Add "The Automatic daylight controls are shown on plan documents and are installed."

NLCAA Comment:

- This change will create consistency in the Standard's and align with the new changes made in NA7.6 and NA7.8 for the 2022 code cycle. This requirement should exist in all Lighting Control Acceptance Requirements found in NA7.6 and NA7.8.

The following items were sent on our 45-day comments but were not addressed. NLCAA believes these two items are too important not be address this code cycle.

2. SECTION 100.1 – DEFINITIONS AND RULES OF CONSTRUCTION

100.1(b) Definitions

LIGHTING definitions:

NLCAA Comment:

- NLCAA likes that the indenting in the previous cycles has been removed.
- Automatic should not be used as the first word, when searching for an item users may not think to use "Automatic" as the first work. E.g., Automatic Time-Switch Control vs Time-Switch Controls.
 - §110.9 "Time-Switch Lighting Controls" list all the Time controls in a very clear format, maybe §100.1 could align with §110.9?
- Lighting controls devices are under the "Lighting definitions:" or found in alphabetical order of §100.1 inconsistently, e.g. Auto Time Switch, Demand Response Control, Occupancy Sensor, Institutional Tuning and Shut-off Controls are some of the various definitions that are not placed uniformly.



- Should a "Lighting Controls:" section be used (remain) and listed just after "Lighting definitions:" with all controls definitions or should all the lighting controls be listed in alphabetical order throughout §100.1 or all of them under "Lighting"?
- This is an inconsistent code section.
- Starting at "Pendant Luminaire (Suspended Luminaire)" and after needs to be indented to the left.
- "Driver" which is just after "Solid State Lighting (SSL)" is not in alphabetical order.

3. SECTION 110.12 – MANDATORY REQUIREMENTS FOR DEMAND MANAGEMENT

110.12(a) Demand responsive controls.

1. All demand responsive controls shall be either:

A. A certified OpenADR 2.0a or OpenADR 2.0b Virtual End Node (VEN), as specified under Clause 11, Conformance, in the applicable OpenADR 2.0 Specification; or

B. Certified by the manufacturer as being capable of responding to a demand response signal from a certified OpenADR 2.0b Virtual End Node by automatically implementing the control functions requested by the Virtual End Node for the equipment it controls.

NLCAA Comment:

- A. and B. are not clearly explaining the differences between each other and how they must be applied. This code is misapplied in the field consistently. Please ensure that the Compliance Manual has a clear explanation of this code section and how it is to be applied to the various scenarios.
- Consider incorporating the 2019 Compliance Manual explanation of option A and B into Section 110.12(a) as code language or a note.

NLCAA Staff