

**DOCKETED**

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<b>Filer:</b>	Javier Perez
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***Staff Supplement to Daylighting Measure Proposal, “California Statewide Utility Codes and Standards Enhancement (CASE) Team Comments - Final CASE Report – Daylighting”, TN# 251803, Docket 22-BSTD-01***

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**Date:** March 28, 2024

**Pages:** 2

**Author:** Simon Lee

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Description of Proposed Regulatory Changes

The measure change proposal submitted by California Statewide Utility Codes and Standards Enhancement (CASE) Team and titled “Daylighting” proposes to make the following changes to the 2025 Standards:

- The proposed code changes are related to the Automatic Daylighting Controls (renamed as “Daylight Responsive Controls”) (named as “Automatic Daylighting Controls” in the 2022 Energy Code) requirements in Section 130.1(d), Section 160.5(b)4D, and other sections of the 2025 California Energy Code.
- The proposed code changes adjust the wattage thresholds that apply to the skylit daylit zones, the primary sidelit daylit zones, and the secondary sidelit daylit zones located in indoor building spaces requiring installations of daylight responsive controls.
- The change would modify Exception 3 to Section 130.1(d) and Exception 3 to Section 160.5(b)4D. This change would move the wattage criteria of the automatic daylighting controls to the main requirement instead of as an exception. The change would require daylit zones with a total connected general lighting load that is greater than or equal to 75 watts to implement automatic daylighting controls.

Further, in secondary sidelit daylit zones where automatic daylighting controls are not required in the corresponding primary sidelit daylit zones, i.e. primary sidelit daylit zones have a total connected general lighting load less than 75 watts, an exception is provided to require daylighting controls only when the total connected lighting load in the secondary sidelit daylit zones is 85 watts or greater.

Staff agrees with the proposed changes to Section 130.1d and 160.5(b)4D and have incorporated substantively similar changes into the proposed 2025 Express Terms.

Staff does not agree with the proposed changes to Reference Appendices NA 7.6.1 for adding two new subsections of functional testing procedures related to controls interactions. Staff has not adopted the proposed changes, as the new subsections are about requirements not directly related to daylight responsive controls in meeting daylighting responsive controls requirements for various daylight availability scenarios, as specified in Section 130.1(d)1 through 130.1(d)5. Further, the additional cost associated with the new, additional functional testing procedures for control interactions has not been identified and the associated cost-effectiveness has not been demonstrated in the measure proposal document (Docket document TN#251803, Docket Number 22-BSTD-01).

#### Staff Analysis and Conclusion

Staff has analyzed the submitted proposal and reached the following conclusions for the measures included in the 2025 Express Terms:

- Based on the evidence presented in the proposal, the measures, as proposed, are cost effective and the author has appropriately followed the Energy Commission's Life Cycle Cost methodology.
- Measure costs premiums presented in the proposal are reasonable and appropriate for the measure proposed.
- Measure energy savings presented in the proposal are appropriately modeled and are credible.
- Measure environmental impacts presented in the proposal are reasonable and appropriate for the measure proposed.