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**CEA Letter 1 of 3_Comments on 2025 BEES - Title 24 Parts 1 and
6_Express Terms_15-day Language**

CEA Comments Letter 1 of 3 - Lighting & Electrical Sections

Additional submitted attachment is included below.



June 28, 2024

California Energy Commission
Docket #24-BSTD-01
715 P Street
Sacramento, CA 95814

Re: Docket Number: 24-BSTD-01 – 2025 Building Energy Efficiency Standards, Title 24 Parts 1 and 6, Express Terms, 15-Day Language

CEA Comment Letter 1 of 3: Lighting & Electrical Sections

Dear CEC Commissioner McAllister and Staff,

Thank you for the opportunity to provide comments on the California Energy Commission's (CEC) 2025 Building Energy Efficiency Standards, Title 24 Parts 1 and 6, Express Terms, 15-Day Language (Energy Code).

The California Energy Alliance (CEA) is a leading advocacy organization for California's energy stakeholders. CEA and its Members had the opportunity to provide comment letters on the 45-Day Energy Code Language (Docket No: 24-BSTD-01, TN#s 256329, 256330, & 256331). CEA is grateful to see the CEC adopt many of the recommendations from these comments and applaud you for listening to industry stakeholders and making the necessary updates to the Energy Code to continue reducing greenhouse gas emissions by maximizing efficiency.

While the above recommendations were generally accepted, CEA would like to comment on and address continued areas of concern in the 2025 Energy Code Express Terms, 15-Day Language. CEA is submitting (3) separate comment letters to address distinct areas of the Energy Code (Lighting/Electrical Sections, Mechanical Sections, and Supplementary Sections/Reports).

The following comments and recommendations (CEA Comment Letter 1 of 3) relate to "Lighting/Electrical Sections" of the Energy Code (TN# 256847):

- 1) **CEA submitted an energy savings measure proposal to the CEC (Docket Number: 22-BSTD-01, TN# 252270) regarding the expansion of Subsection 130.1(b) requirements for nonresidential Multilevel Lighting Controls.**
 - a) Using the CEC’s measure proposal template, CEA showed that lowering the connected lighting load threshold along with removing of certain exceptions meets the cost-effectiveness criteria set forth by the CEC. The changes to Subsection 130.1(b) were workshopped with CEA stakeholders and during numerous meetings with stakeholders taking part in the Lighting Language Cleanup Initiative (Docket No: 22-BSTD-01, TN# 250676) referenced above. While many of the recommendations from the Cleanup Initiative were included in the 2025 Energy Code Express Terms, the lowering of the connected lighting load threshold from 0.5 W/sf to 0.4 W/sf was omitted.
 - b) **CEA respectfully asks the CEC to reconsider this Multilevel Lighting Controls measure proposal and include in the 2025 Energy Code Express Terms, 15-Day Language.** This energy savings measure proposal supports the CEC’s goal of reducing wasteful, uneconomical, and unnecessary uses of energy for the state.
 - c) If the CEA proposal is rejected by the CEC, we request an explanation to why this proposal is rejected.
 - i) If the CEA measure proposal is omitted, then we recommend removing the “100 square feet” language.
- 2) **Section 130.1(b) Exception 1**
 - a) Strike “indoor”. Not needed as this whole section is for indoor lighting.
 - i) Exception 1 to Section 130.1(b): ~~An indoor~~ sSpace that has only one luminaire.
- 3) **Sections 130.1(c)6**
 - a) Correct and/or clarify “parking areas” term used in 130.1(c)6. and 130.1(c)6E.
 - i) CEA is confused by the spaces “parking garages and parking areas” being called out versus the terms used in the definitions Section 100.1 which are “parking garage buildings”, “parking garage areas”, and “parking zone and ramps”.
 - (1) CEA recommends updating this terminology throughout the Energy Code to maintain consistency across sections.

4) Sections 130.1(d) and 160.5(b)4D

- a) CEA feels there is a typographical error in Exception 3 to Sections 130.1(d) and 160.5(b)4D. The 45-Day Language states less than “85” watts when the requirement threshold is “75” watts. To be consistent with the new wattage threshold noted in the section, the exception should reference the same threshold.
 - i) Exception 3 to Section 130.1(d): Where daylight responsive controls are not required for the primary sidelit daylit zones, and where the total wattage of general lighting luminaires in the secondary sidelit daylit zones is less than ~~8~~75 watts, daylight responsive controls are not required for the secondary sidelit zone.
 - ii) CEA would also like to note that if the exception should be 75 watts, then the Exception should be stricken as it's already called out in the secondary daylit zone section above.
 - iii) Also note that all recommendations and comments apply to Section 160.5(b)4D.

5) Section 130.1(d)2Biii

- a) CEA recommends the **Exception to Section 130.1(d)2Biii** should be struck in its entirety as the primary use of solid-state technology now means that the manufacturer can provide any number of control zone requests within the assembled structure no matter the length. An existing example of this problem is one where a 16' linear luminaire was totally controlled as the primary daylight zone in a classroom, even though it extended 8' into the secondary daylight zone. This causes issue with the daylight sensor no longer providing adequate daylight adjustment to the secondary daylit zone.

6) Section 130.4(a)1

- a) Reinstating Plan Review Requirements for Enhanced Title 24, Part 6 Compliance in Section 130.4(a)1 per Docket 22-BSTD-01, TN# 252276. This proposal is essential for ensuring Energy Code compliance while introducing a more collaborative approach with the Authority Having Jurisdiction (AHJ). CEA respectfully asks the CEC to reconsider the TN#252276 proposal with the following update:
 - i) Change “Certifies” to “Review”
 - (1) “~~Certifies~~ **Review** plans, specifications, installation certificates, and operating and maintenance information meet the requirements of Part 6.”



- ii) Reinstating these requirements allows the Acceptance Test Technician to be involved earlier in the design phase to help the responsible parties, such as the lead architect or engineer, with compliance by alerting them of any gaps in energy code requirements prior to construction.

7) Section 150.0(k)3

- a) This requirement should be for all permanently installed outdoor lighting not just outdoor lighting that is mounted to a building. The current requirement leaves out lighting poles and other hardwired lighting. Permanently does not include solar lights or plugged in lights.
 - i) 150.0(k)3A. Outdoor permanently installed lighting ~~permanently mounted to a residential building or to other buildings on the same lot~~ shall meet the following requirements:

8) Section 100.1 Definitions

- a) Multilevel Lighting Control: Recommend adding “in addition to ON and OFF to the definition.
 - i) Multilevel Lighting Control enables the intensity of lighting to be adjusted upward or downward in addition to ON and OFF.

CEA thanks the CEC for the opportunity to submit these comments, and we look forward to answering any questions or comments regarding our recommendations to the 2025 Energy Code Express Terms, 15-Day Language.

Sincerely,

California Energy Alliance
josh.dean@caenergyalliance.org