

<b>DOCKETED</b>	
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<b>Project Title:</b>	2022 Energy Code Exceptional Methods
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*Comment Received From: Lutron Electronics Co., Inc.  
Submitted On: 12/10/2024  
Docket Number: 24-BSTD-04*

**Lutron Electronics Co, Inc comments on the automatic window shade option for 2022 Energy Code Compliance Software, Residential**

*Additional submitted attachment is included below.*

December 4, 2024

Submitted via: <https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=24-BSTD-04>

Mr. Andrew McAllister  
Commissioner  
California Energy Commission  
1516 Ninth Street  
Sacramento, California 95814

Re: Docket No. 24-BSTD-04

**Lutron Electronics Co., Inc. comments on the automatic window shade option for 2022 Energy Code Compliance Software, Residential (CBECC-Res)**

Dear Commissioner McAllister,

Thank you for the opportunity to review and provide comments on the automatic window shade option for 2022 Energy Code Compliance Software, Residential (CBECC-Res). These comments are submitted on behalf of Lutron Electronics Co., Inc.

As you may know, Lutron was founded in 1961 and is headquartered in Coopersburg, Pennsylvania. From lighting controls and lighting management systems to automated window shades for any type of building, the company offers more than 15,000 energy-saving products, sold in more than 100 countries around the world. In the U.S. alone, Lutron products save an estimated 10 billion kWh of electricity, or approximately \$1 billion in utility costs per year. The company's early inventions— including the first solid-state dimmer invented by Lutron's founder, Joel Spira—are now at the Smithsonian's National Museum of American History in Washington, DC.

Please find our comments below. Please contact Michael Jouaneh at 484-809-2782 or [mjouaneh@lutron.com](mailto:mjouaneh@lutron.com) if you have questions or would like more information on these comments. Thanks again for your consideration.

Respectfully submitted,



Pekka Hakkarainen, PhD  
Vice President Government Relations

Lutron Electronics strongly supports use of automated window shading to count towards energy code compliance. We also recommend that this compliance option be applied to not only the existing 2022 Energy Code, but also the upcoming 2025 Energy Code. As the docketed [Automated Window Shading Modeling Report](#) shows, automatic shading reduces heating and cooling loads in all climate zones except zone 1. Automated shading not only helps reduce summer peak energy loads and balance winter heat gain but also enhances consumer comfort and energy efficiency.

In addition to reducing cooling and heating loads in homes, automated shades in commercial buildings can significantly increase lighting energy savings by optimizing daylight-responsive controls for electric lighting. A study by Herrick Laboratories at Purdue University, commissioned by Lutron, demonstrated that automated shades can save 1.6 kWh/sq. ft./year in lighting energy. The study is available upon request.

In summary, automated shades contribute to energy savings and should therefore be considered as part of energy code compliance. We urge the Commission to approve this compliance option.

Thank you for your consideration.