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Submitted via email to Docket@energy.state.ca.us

Ms. Karen Douglas
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

NEMA Changes to CCR Title 20 45 Day Language Regarding Lighting Controls Docket No. 11-AAER-2

The National Electrical Manufacturers Association (NEMA) appreciates the opportunity to provide the following change proposal to the subject 45 Day Language as published by CEC along with the Notice of Proposed Action on October 7, 2011. These comments are submitted on behalf of NEMA Lighting Controls Section member companies.

As you may know, NEMA is the association of electrical equipment manufacturers, founded in 1926 and headquartered in Arlington, Virginia. Its member companies manufacture a diverse set of products including power transmission and distribution equipment, lighting systems, factory automation and control systems, and medical diagnostic imaging systems. Worldwide annual sales of NEMA-scope products exceed $120 billion. .

Thank you for your consideration of these proposed changes. If you have any questions on these comments, please contact Alex Boesenberg of NEMA at 703-841-3268 or alex.boesenberg@nema.org.

Sincerely,

Kyle Pitsor
Vice President, Government Relations

NEMA Changes to CCR Title 20 45 Day Language Regarding Lighting Controls

Changes to Section 1602 "Definitions"

1602(l) "Astronomical time-switch control": Change "controlling lighting based on the time of day or astronomical events" to "controlling lighting based on the time of day and astronomical events". This editorial change is submitted because the use of word "or" may describe same device as "Automatic time-switch control"

1602(l) "Dimmer": Change to "means a ~~self-contained~~ lighting control device that varies the ~~current through an~~ electric light lumen output in order to ~~control~~ change the level of illumination and energy use." This change allows for a greater range of technological solutions in the future besides current control and removes the redundant mention of being self-contained.

1602(l) "Lighting photo control": Add word "Exterior" to the definition and remove the word "Lighting" and combine the words "photo" and "control". The reason for this is to eliminate confusion with the definition for automatic daylighting control and to make terminology consistent between Title 20 and Title 24. Additionally, delete ", and may also have the capability to provide a signal proportional to the amount of daylight to a self-contained lighting control system for the purpose of continuously dimming the electric lights" This technical change is submitted since the inclusion of last portion of sentence defines the device as basically the same as the definition for "Automatic daylight control".

1602(l) "Occupant sensor" paragraphs 2, 3 and 4: Change "Occupant Sensor" to "Occupancy Sensor". This editorial change is submitted to reflect standard terminology already used in industry and matches common product markings.
Additionally, change definition of occupancy sensor to: ," which means an occupant sensing device that is used indoors and automatically turns lights off when an area is vacated and is capable of automatically turning lights on when an area is occupied "…..

1602(l) "Occupant sensor" paragraphs 3 and 4: Delete "or a vacancy sensor". The reason for this technical change is that "Vacancy Sensors" do not meet these requirements by definition.
Additionally, change both descriptions to read: "which means a motion sensor or an…"

Changes to Section 1605.3 "State Regulations for Non-Federally-Regulated Appliances"

1605.3(l)(2)(C)(3): Delete this sentence. This feature is unnecessary and does not directly relate to energy savings. Many devices may use day of week instead of date. It is unclear if current or programmed sunrise/sunset times are displayed. Small devices may have difficulty displaying all these data.

1605.3(l)(2)(D)(1): Change "day lighting" to "daylight". Editorial change.

1605.3(l)(2)(F)(1)(a): Add text "by a minimum of 65 percent, or the lowest limit of the light source, when the dimmer is at its lowest level." This accounts for some technologies which currently cannot reduce power consumption by 65% (some HID for example which can reduce power consumption by 30%).

1605.3(l)(2)(G)(1)(a): Change "turning off all lights" to "turning off controlled lights". This technical change reflects that "Partial Off Sensors" do not meet this requirement by definition.

1605.3(l)(2)(G)(1)(f): Delete the paragraph "Occupant sensing devices that are certified as having manual-on functionality shall not be capable of conversion by the user between manual and automatic on/off functionality and shall not incorporate DIP switches or". This is an editorial change because this requirement is already required in 1605.3(l)(2)(G)(4) and (5) in a different form. The text may be incorporated into (G)(4)(b) and (G)(5)(a) as suggested below.

1605.3(l)(2)(G)(1)(g): Change "Occupant sensing devices" to "Occupancy Sensors". This is a clarification because vacancy sensors cannot meet this requirement by definition.

1605.3(l)(2)(G)(4)(b): Change "shall not be capable of conversion by the user to automatic-on functionality;" to "shall not incorporate DIP switches, or other manual means, for conversion between manual and automatic functionality." This editorial change incorporates the text of 1605.3(l)(2)(G)(1)(f).

1605.3(l)(2)(G)(5)(a): Change "shall not be capable of conversion by the user to automatic-on functionality;" to "shall not incorporate DIP switches, or other manual means, for conversion between manual and automatic functionality." This editorial change incorporates the text of 1605.3(l)(2)(G)(1)(f).

Lastly, NEMA requests an opportunity for additional review of the Data Submittal Checklist for Self-Contained Lighting Controls before it is finalized, if any changes are made to it as a result of the public comment and review process.