

January 11, 2012

Dear Commissioners and Program Managers,

**Subject: Moving Lighting Control Regulation From Title 24 to Title 20**

I strongly object to the moving of lighting controls to Title 20. I am of the opinion that lighting controls should remain in Title 24 as an optional system that can be used by the end users to achieve the Code's mandated energy savings and peak demand reduction.

**1. Essential to meeting State Strategic Plan:**

A. Lighting controls are SYSTEMs and are vital in achieving the goals stated in the CA Energy Efficiency Strategic Plan, Zero Net Energy, Action Plan: Commercial Building Sector 2010-2012.

The plan states as a Critical Success Factor the need for, "Technological improvement and commercial viability. ZNE will be helped by the development and market diffusion of new technologies (e.g. LEDs, hybrid lighting, heat pumps, integrated multi-stage units, solar-thin film). The marketplace needs to supply these innovations and consumers must begin to demand these new products instead of old technologies." The Plan in Strategy 2-2 specifically states there is a need for overall building and/or system performance: "... Alternative mechanisms to improve energy performance need to be developed, and may include review of overall building and/or system performance rather than prescriptive code approaches."

The Plan further refers to the "smart building" where it states in Strategy 2-5 the need for "... Federal and state agencies to advance "smart buildings" that combine technology and information feedback.

B. Lighting Control Systems are essential to shedding peak loads specially when our statewide demand for power are at its peak. By de-emphasizing the need for lighting controls, the State will not be able to continue to reduce its peak demand using lighting control strategies properly.

**2. Lighting Control Systems Need to Remain Defined as "Systems":**

By moving the entire lighting control technology into the Appliance Standards, the technology will be viewed as implementing single devices instead of integrated control systems.

- A. Can a widget help achieve any of the needs of our State to achieve higher level of energy efficiency? Not when installed by itself; only when it is a component of a SYSTEM such as a lighting control system. As far as developing the "one-stop" energy management solutions as discussed in Strategy 2-7 where it states, "improve the ease and access to more integrated energy management (a precursor for ZNE)." How does a widget provide a "one-stop energy management solution? Again, only when a component of a SYSTEM!
- B. If we move lighting controls to Title 20, where it is seen as widget, not an integrated system, we will be undermining the State's Plan. By relegating lighting control, - whether basic or advanced, to Title 20, history will repeat itself with the recurrence of improperly installed controls being disabled. This will impact the persistent energy savings we all are striving hard to achieve while on the path to ZNE.

In conclusion, I contest and strongly object to any effort to move lighting controls to Title 20.

I would recommend that you differentiate components of lighting control systems such as occupancy sensors from true control systems that include the necessary and proper interface between the control device, sensors and communication devices and leave the lighting control systems as an optional system similar to HVAC and plug load control systems. The devices can be moved into appliances but the systems themselves or integrated lighting control system incorporating those devices should remain as a key element of Title 24.

I would like to thank you , Commissioners, Program Managers and Commission staff, very much in advance for adding this comment to your proceeding after January 3. I would be at your hearing but I am currently traveling out of state.

#### **Who We Are:**

Our firm is a small consulting firm and is not in any way affiliated with any lighting manufacturer, distributor or dealers; we have no vested interest in any technologies involving control.

Our goal as a consulting firm specializing in business strategies in the energy field. We are trainers who use the ENERGY STAR energy management program to educate and assist in the implementation of large scale energy efficiency programs nationally.

We are a Stakeholder in the California Advance Lighting Controls Program, a non-profit organization seeking to train and educate the workforce in the electrical industry to enhance the skills necessary to advance the use of advanced lighting control systems.

We do not profit from the technology in any way and have volunteered countless hours statewide in building awareness in all market sectors of the incredible financial benefits of cost effective energy efficiency strategies. Our opinion is strictly on a volunteer basis to help the people of the State of California and ensure the economic recovery occurs through job training and proper dissemination of technological knowledge and legislation.

Best regards,

Lee

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On Wed, Jan 4, 2012 at 9:25 AM, Energy Commission <[listenergia@listserver.energy.ca.gov](mailto:listenergia@listserver.energy.ca.gov)> wrote:  
15-Day Public Comments for the Appliance Efficiency Standards for Battery Chargers and Moving Lighting Control Regulation From Title 24 to Title 20

For more information:

[http://www.energy.ca.gov/appliances/battery\\_chargers/documents/](http://www.energy.ca.gov/appliances/battery_chargers/documents/)

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