

May 30, 2012

Submitted via email to [Docket@energy.ca.gov](mailto:Docket@energy.ca.gov)California Energy Commission  
Docket No. 12-BSTD-1  
Dockets Office  
1516 Ninth Street, MS-4  
Sacramento, CA 95814**DOCKET****12-BSTD-1**DATE     MAY 30 2012    RECD.     MAY 30 2012    **Re: Comments for Docket 12 BSTD-1 Revisions to California Code of Regulations, Title 24, Part 1 and Part 6**

I respectfully submit the following comments for the 15-day language for revisions to the California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 1 and Part 6.

**Section 130.1.a.3.A. Other Lighting Controls****Current Text:**

Other lighting controls may be installed in addition to the manual lighting controls provided they do not override the functionality of controls installed in accordance with Section 130.1(a)1, 2, or 4.

**Comment:**

There are situations where manual control of egress lighting is desired and automatic override is required.

**Recommendation:**

Allow the use of UL924 shunt relays for automatic on of luminaires designated as egress lighting that are normally under manual control.

**130.1.c.2. Shut-Off Controls****Current Text:**

Countdown timer switches shall not be used to comply with the automatic shut-OFF control requirements in Section 130.1(c)1.

**Comment:**

Countdown timer switches are can save more energy than a vacancy sensor with the same time delay because the countdown timer starts its count down immediately upon activation, whereas the vacancy sensor remains on for the duration of the occupancy plus the duration of the time delay after the space becomes vacant. Countdown timer switches are easy to install, set up and commission, whereas vacancy sensors require more time to adjust the sensitivity and to commission. In some situations vacancy sensors do not function properly due to local obstructions to the 'view' of the sensor. Countdown timer switches are excellent automatic shut off devices; much better than installing an automatic time-switch control with a 2 hour override in accordance with

**130.1.c.3****Recommendation:**

Revise this section struck in its entirety. If this is not acceptable, then add language allowing timer switches to be used in applications where other means of automatic shut off control will not operate reliably.

### **130.1.c.2.Exception 1 Shut-Off Controls - Countdown Timer Switches**

**Current Text:**

Single-stall bathrooms less than 70 square feet, and closets less than 70 square feet may use countdown timer switches with a maximum setting capability of ten minutes comply with the automatic shut-off requirements.

**Comment:**

Ten minutes is not sufficient time for restrooms.

**Recommendation:**

Change the allowable time for restrooms to fifteen minutes.

### **150.0.k.7. Lighting other than in Kitchens, Bathrooms, Garages, Laundry Rooms, and Utility Rooms.**

**Current Text:**

Lighting installed in rooms or areas other than in kitchens, bathrooms, garages, laundry rooms, and utility rooms shall be high efficacy or shall be controlled by either dimmers or vacancy sensors. EXCEPTION 1 to Section 150.0(k)7: Luminaires in closets less than 70 square feet.

**Comment:**

Small closets are idea spaces for self-contained automatic shut-off devices. Don't exclude these spaces, and include timer switch as acceptable control method. Also allow automatic on using occupancy sensors in closets.

**Recommendation:**

Revise the exception to require luminaires in closets less than 70 square feet to be controlled using either electronic countdown timer switches or vacancy or occupancy sensors.

Thank you for your consideration of these comments.

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