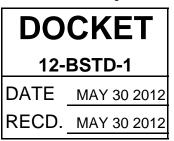
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May 30, 2012 Submitted via email to <u>Docket@energy.ca.gov</u>

California Energy Commission Docket No. 12-BSTD-1 Dockets Office 1516 Ninth Street, MS-4 Sacramento, CA 95814 Phone: 415-307-5106 Fax: 805-781-0816 RickMiller@RNM-Eng.com



Re: Comment for Docket 12 BSTD-1 Revisions to California Code of Regulations, Title 24, Part 1 and Part 6

I respectfully submit the following comment 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.

TABLE 130.1.-A Multi-Level Lighting Controls and Uniformity Requirements Current Text:

Linear fluorescent and U-bent fluorescent >13 watts:

Minimum Steps: 20-40%, 50-70%, 80-85%, 100% percent of full rated power Note 1. Full rated input power of ballast and lamp, corresponding to maximum ballast factor.

Comment:

The high level step of 100% seems to preclude the implementation of setting a high-end trim or of tuning the ballast to maximum value of something less than 100%.

Recommendation:

Define the "maximum ballast factor" to be the high-end trim or tuning value as defined in Section 100.1 Lighting Definitions.

Thank you for your consideration of this comment.

Richard N. Miller, PE. LC, LEED AP President, RNM Engineering, Inc.