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Vice President, Government Relations

California Energy Commission <b>DOCKETED</b> 14-BSTD-01
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Submitted via email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

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

**Notice of Staff Workshop on Draft Language for the Residential and Nonresidential Building Energy Efficiency Standards and Associated Documents**

Dear Commissioner McAllister,

The National Electrical Manufacturers Association (NEMA) appreciates the opportunity to provide these comments, submitted on behalf of the NEMA High Performance Building Council's Codes and Standards Review Committee.

As you may know, NEMA is the association of electrical equipment and medical imaging manufacturers, founded in 1926 and headquartered in Arlington, Virginia. Its nearly 400 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. The U.S. electroindustry accounts for more than 7,000 manufacturing facilities, nearly 400,000 workers, and over \$100 billion in total U.S. shipments.

We look forward to working with you further on this important project. If you have any questions on these comments, please contact Alex Boesenberg of NEMA at 703-841-3268 or [alex.boesenberg@nema.org](mailto:alex.boesenberg@nema.org).

Sincerely,

Kyle Pitsor  
Vice President, Government Relations

## **Notice of Staff Workshop on Draft Language for the Residential and Nonresidential Building Energy Efficiency Standards and Associated Documents**

New proposal to California Title 24:

Rationale: It is well known that monitoring electrical energy usage of disaggregated load types in a building identifies inefficient energy usage patterns that, when addressed, result in reducing energy consumption by up to 15%. Electrical energy monitoring is very cost effective. Without monitoring loads and performing maintenance, buildings can lose up to 8% per year of their original post-construction or post-renovation energy savings. The effectiveness and continued efficiencies of each power consuming system depends on building owners and facility managers observing and acting upon energy consumption data. By providing actionable and timely energy consumption data to building owners and operators through energy monitoring of disaggregated load types, electrical energy consumption can be reduced. Additionally, ASHRAE Std. 90.1 – 2013 and the Washington State energy code, along with a number of city energy codes/ordinances, now require energy monitoring. We request the CEC consider a requirement for electrical energy monitoring of disaggregated load types in buildings 25,000 ft<sup>2</sup> and greater.

Proposed Regulatory Language to Title 24 Section 130.5:

c) Electrical Energy Monitoring. For buildings 25,000 ft<sup>2</sup> or greater in total building floor area, electrical power distribution systems shall have measurement devices installed for monitoring the electrical energy usage of load types according to TABLE 130.5-B. This may be accomplished by any of the methods in Section 130.5 (b).