

# Docket No. 15-BSTD-01

February 18, 2015

Dear Sir or Madam

California Energy Commission

**DOCKETED**

**15-BSTD-01**

**TN # 74563**

**FEB 19 2015**

Please at least maintain the current 45 day language of the 2016 Title 24.

It would even be better to have less or no restrictions for lighting retrofits. For example, existing fixtures, which are not currently dimming, could be retrofitted with the same or fewer number of fluorescent lamps, TLEDs or LED lightbars and new ballasts or drivers or with LED troffer kits, as long as lower wattage, should not trigger code.

Since the current 2013 Title 24 is decimating the lighting retrofit industry in California, please allow the 2017 version to take effect ASAP, which is well before the 2013 version expires.

I have 26 years of lighting retrofit experience, including working for a distribution and a lighting retrofit contractor and being a lighting consultant and educator, mostly in California.

I know several lighting retrofit contractors, who are having a difficult time staying in business with the existing Title 24. I also know several end-customers, who decided not to do lighting retrofits, because they are not cost effective with this Title 24, because the cost can be 20 – 30% higher usually with no or just slight additional savings.

If you have not read these articles, please do.

- Do Energy Codes Really Save Energy?
  - <http://www.tedmag.com/News/features/Do-Energy-Codes-Really-Save-Energy.aspx>
- Controls or LEDs: What's the Best Bang for the Buck?
  - Page 36 of December issue of Architectural SSL Magazine
  - <http://www.architecturalssl.com/>

Often controls do not save energy. Time and time again, I have seen annual hours of operation go up in elementary school classrooms and private offices after occupancy sensors were installed, because before installation energy-cop students, teachers and office workers manually turned off lights every time they left and after installation they allowed the 10 – 15 minute delay of the sensors to turn the lights off.

Although I am confident that Title 24 will always allow sufficient light levels for the visual part of the visual system, the CEC should be careful to allow sufficient light for the biologic or non-visual part of the visual system.

Hopefully the CEC will stop using 'experts' such as Doug Avery and Jim Benya, who it is my professional opinion, have their own agendas and do not really know the lighting retrofit industry.

Please use terms that lighting professionals and end-customers understand, such as retrofitting and replacing fixtures. These make a lot more sense than alterations or modifications.

You can email or call me 9 AM or later Pacific time, which is 7 AM or later here in Hawaii.

Thanks for your consideration.

Stan Walerczyk

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