

Docket No. 15-BSTD-01

February 19, 2015

Dear Sir or Madam

This is in addition to my February 18 comments.

The main message still applies.

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.

With the current Title 24, not only are lighting retrofit contractors struggling, but also many installers have lost their jobs. The CEC and Doug Avery and Jim Benya types should compensate them.

The old adage 'if it ain't broke, don't try to fix it' applies. The previous Title 24 worked quite well for lighting retrofits.

I would not be surprised in groups or individuals of lighting retrofit contractors, distributors and ESCOs sued the CEC for the legal term of unfair blockage of business.

It is my understanding that the only thing saving the lighting retrofit industry in California is Prop 39, but LED T8s (TLEDs) are being used with existing ballasts a lot, because that does not trigger Title 24, even it that is not a very good solution.

With x amount of money that an end-user has, it is often is more cost effective to do more lighting than less lighting with controls.

Lighting retrofitters and end-customers know what is cost effective and will get that stuff installed without any mandate.

Unless the CEC makes lighting retrofits much more cost effective soon, not just in 2017, I will continue to mention how bad Title 24 is in my presentations across the country and in my articles.

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.

California Energy Commission

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