

# Docket No. 15-BSTD-01

February 21, 2015

Dear Sir or Madam

California Energy Commission

**DOCKETED**

**15-BSTD-01**

**TN # 74660**

**FEB 23 2015**

Why did the 2013 Title 24 start to consider lighting retrofits the same as new construction lighting, when they are so different?

For example, it may be good to mandate occupancy sensors in new construction, because it is not known how people will use manual controls. But requiring occupancy sensors in many elementary schools, private offices and other existing applications, where people are doing an excellent job manually turning off lights, increases the cost of lighting retrofits, especially since occupancy sensors are mandated there are no rebates for them, and annual hours of operation may actually increase, because people will allow the 10 – 15 minute delay for the sensors to turn off the lights.

Please remove the CLCATT requirement in occupancy sensor only projects, because they are not necessary and costs could be kept down.

Dimming may be good in many new construction projects, but many existing ones, such as retail stores, will probably not use dimming even if they get it. Even in new construction, dimming is often not cost effective, because LED and high performance incumbents are so energy efficient, the wattage at full output is so low that the additional cost for dimming and controls is not worth it.

Regarding cost effectiveness of dimming and controls for energy savings from lighting, I highly recommend that the CEC consult with Robert Karlicek, PhD, who is the Director of the Smart Lighting Engineering Research Center at Rensselaer Polytechnic Institute.

<http://faculty.rpi.edu/node/1064>

If the CEC will allow lamp for lamp replacement without triggering code, please also allow delamping without triggering code.

Although this may be a better question for utilities and their rebate programs, it may be good to bring up here. Why are customized rebates, which are from reduced KWH over the first year, based on maximum allowed lighting power density in Title 24, instead of what is really there now, which is much more realistic? Those smaller rebates can make it more difficult to get lighting retrofit projects approved and installed. One person told me that, but I have not confirmed, that LADWP is providing rebates based on what is currently installed. Maybe there are different rules for IOUs than MUNIs.

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

Stan Walerczyk, HCLP, CLEP  
Principal of Lighting Wizards  
Chair of Human Centric Lighting Society and Committee  
<http://lightingwizards.com/>  
<http://humancentriclighting.org/>  
[stan@lightingwizards.com](mailto:stan@lightingwizards.com)  
808-344-9685