

## Energy - Docket Optical System

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**From:** Ownby, Adrian@Energy  
**Sent:** Wednesday, February 25, 2015 12:45 PM  
**To:** Energy - Docket Optical System  
**Cc:** Geiszler, Eurlyne@Energy; Strait, Peter@Energy; Shirakh, Maziar@Energy  
**Subject:** FW: Support of Title 24 Modifications for Lighting Retrofits Docket No. 15-BSTD-01

Docket Unit – Please add this email (below) to Docket #15-BSTD-01. Thanks.

-Adrian

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California Energy Commission

**DOCKETED**

**15-BSTD-01**

**TN # 74827**

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**From:** Matt Tracy [<mailto:mtracy@enlightenergy.com>]  
**Sent:** Tuesday, February 24, 2015 2:58 PM  
**To:** Ownby, Adrian@Energy  
**Subject:** Support of Title 24 Modifications for Lighting Retrofits Docket No. 15-BSTD-01

**RE: Docket No. 15-BSTD-01**

Support of Title 24 Modifications for Lighting Retrofits

Title 24 as it is currently written is having a negative effect on energy efficiency in California by making lighting retrofit projects so expensive that owners won't do them, the opposite of the intention of the law.

I have been in the lighting retrofit business for 25 years. In that time, California has managed to keep its per capita use of electricity level through the efforts of people in the energy efficiency retrofit business, in spite of increased use of computers and air conditioning. This industry, ironically, is being threatened by the law that mandates energy efficiency.

Title 24 is a well thought out document for new building standards, but it applies to retrofits as well. If the cost of a new building is increased by a couple of dollars per square foot to gain the last ounce of energy savings available, it won't kill the project. If the cost of a lighting retrofit project is increased by the same amount, the payback may be increased such that it doesn't make sense for the owner to do the project.

We have lost jobs because of Title 24 2013, and I personally know contractors who are struggling to keep their businesses open because of Title 24 2013. Continuing with the existing title 24 will surely drive more energy efficiency professionals out of business.

A simple addition to the law that exempts retrofits or energy efficiency replacements that reduce energy use from complying with the intricacies of Title 24 2013 would solve the problem of a law doing the opposite of its intended goal.

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