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California Energy Commission

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Building Standards Development Unit

California Energy Commission  
1516 Ninth Street, Mail Stop 37  
Sacramento, CA 95814

Dear Concerned,

Thanks for the opportunity to comment. Following are my concerns regarding the 2016 California Title 24 Building Energy Efficiency Standards, Draft.

Subchapter 7, Section 150.0 (k) 1. Luminaire Requirements G, indicates that screw based luminaires will be accepted if in compliance with Appendix JA8. In proviso iii) it indicates that lamps must be "installed". Can the word, "installed" be replaced with "supplied" to avoid any issues implementing the action. Installed lamps in a luminaire will likely result in broken lamping.

In Joint Appendix JA8 it is unclear in both JA 8.3.6 Additional Tests for Dimming Light Sources and JA 8.4.6 Dimming, Reduced Flickering and Noise Level whether dimmable lamps are required. As I read JA8, dimming appears to be optional and if I choose to supply a dimming lamp, I would then need to comply with these two paragraphs. Is this a correct interpretation of the draft?

Joint Appendix JA8 list six required markings on the light source, wattage, lumens, CCT, CRI, CA T-24 Compliant and Date. While I can see the need for the top five to be on the light source, I wonder if the month/year manufacturing date can be accomplished on the packaging. Further, I wonder if a T-24 logo could be established indicating compliance. A small T-24 would consume less physical space than writing out "CA T-24 Compliant" on the shell of a light bulb.

In the Residential Outdoor Lighting section, I do not see an exception for Landscape Light, an exemption that IS included in the non-residential section. For clarification, it would be good to include the same exception for both line and low-voltage landscape lighting. As a manufacturer of landscape lighting, clarification on this point is a question we are often asked.

Please consider these comments when working to rectify the 2016 California Title 24 Building Energy Efficiency Standards requirements.

Thanks again for the opportunity to comment,

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