

Via Email

California Energy Commission
Docket No. 15-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

California Energy Commission

DOCKETED

15-BSTD-01

TN # 75397

MAR 12 2015

Re: Sampling of Nonresidential Outdoor Lighting Controls

Dear Docket Office:

In Nonresidential Appendix NA 7.6, for the 2013 and the proposed 2016 Standards, there are provisions that allow sampling for nonresidential indoor lighting control Acceptance Testing. This is appropriate in that it would not be cost effective to test every single nonresidential indoor lighting control.

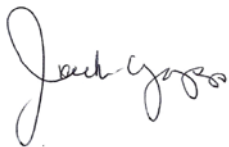
However, there are no similar sampling provisions in Nonresidential Appendix NA 7.8 for nonresidential outdoor lighting controls, in either the 2013 or proposed 2016 Standards. It is not cost effective to test each and every lighting control.

Energy Commission staff has responded to inquiries, stating that it would be appropriate to use the same sampling procedures that are allowed for nonresidential indoor lighting control Acceptance Testing, when conducting Acceptance Tests for nonresidential outdoor lighting controls. However, this is simply not consistent with the code language.

Therefore, for the sake of cost effectiveness, to be consistent with staff recommendations, and to be consistent with the sampling provisions allowed for nonresidential indoor lighting control Acceptance Testing, sampling provisions should be developed for nonresidential outdoor lighting control Acceptance Testing.

Thank you for your consideration of this submission.

Sincerely,



Senior Vice President
NLCAA