

Energy - Docket Optical System

From: Mark Spahn <markspahn@mylightingcompany.com>
Sent: Friday, March 13, 2015 10:45 AM
To: Energy - Docket Optical System
Cc: Ownby, Adrian@Energy
Subject: Docket No. 15-BSTD-01

California Energy Commission

DOCKETED

15-BSTD-01

TN # 75398

MAR 13 2015

Re: Docket No. 15-BSTD-01

I fully support the changes to Version 9 regarding Additions and Alterations of Interior and Exterior Lighting Fixtures.

I would like to provide some comments:

- as brought up at the CEC hearing on April 8th:

1) it would be good to extend the >20% Savings to the Space, rather than just the luminaire for luminaire replacement. This would allow for upgrading the space to meet requirements set by the IES, OSHA and ASHRAE, when applicable. In some cases, Lighting Levels may need to be increased in some Areas, due to a change in use or perhaps new legislation, the IES Handbook states, even the age of the person completing the work may determine the need to have higher light levels in a given area. Opening up the language from One Luminaire to One Luminaire, to a total reduction in wattage of the Luminaires within a given space by >20% (or something like that) would allow changes, that would comply with IES or ASHRAE tables, without strictly limiting each fixture for fixture replacement. This will meet the intent of the Title 24 provisions, while allowing Engineers, Architects, Lighting Designers, LEED Specialists and the like the flexibility to Design Projects that do not restrict the Design Process.

2) And this may have been covered. There are many Maintenance or Group Reballasts projects, where the total reduction may not meet the >20% requirement. An example of this would be a Company like CB Commercial that does a reballast/relamp project where the current ballast is a Third Generation Electronic T8 Ballast. In order to meet the requirement, the options would be to go to a New Electronic T8 Ballast System with a Low Power Factor and perhaps 28 Watt lamps or to go to LED. There are Tens of Thousands of these projects a year in California that simply due to the size of the space or because they are doing a Group Reballasting, will exceed the 40 luminaire/component limit. Even your local Safeway Grocery Store or Coscto or any other major Department Store, may exceed the 40 luminaire limit (annually), simply by maintaining their existing lighting fixtures. There needs to be some type of exception or lower standard for these types of projects; otherwise going to LED may be the only option for these companies and that cost could be prohibitive.

Finally, I am in Full Support of finding a way to Correct the 2013 Title 24 language to something similar to Version 9 at the earliest possible time, in order to bring back an Industry that has been Devasted by the Current 2013 Title 24 Language.

When I attended the meeting on March 8th, I saw that the Intent of the CEC was to Save Energy, Serve the Community and Protect the Public Interest. I have a Degree in Environmental Studies, with a Specialty in Energy Efficiency. Those are my goals as well. Let's move forward with the Intent of Saving Energy and not limit the language to Individual Luminaires to Individual Luminaires or by preventing companies from upgrading to better energy efficient technologies, by making it too expensive or cumbersome to do so.

Thank You for your time and consideration.

All My Best,

Mark Spahn
ABI Services, Inc.
3031 Stanford Ranch Road, #2348
Rocklin, CA 95765

Office: 510-487-5483 (LITE)...Fax: 510-991-8099...Mobile: 510-552-6061