



California Energy Commission

**DOCKETED**

**15-BSTD-01**

TN # 75399

MAR 13 2015

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March 13, 2015

**Subject: Docket No. 15-BSTD- 01 – Title 24 Lighting Standards**

Committee & Leaders,

I am writing in regards to the current proposed updates to the Title 24 Energy Efficiency Code & Standards. I am the CEO of American Lighting. Last year's changes to the standards had a huge impact to my company and to the lives of many my employees. **Our company is on the verge of going out of business as a result of the impact from these changes.** I am 55 years old and I will survive if we do close the doors. My large base of employees won't fare as well. These employees are all hard working people that have worked hard to save this state in excess of 40 MW's of power over the past 28 years. It will be a shame to see them all lose their jobs – forced to look for work in other industries because there is no longer an opportunity in the world of energy efficient lighting in California. This is borderline criminal if it happens.

I hope, beg and pray that you consider making the changes that are outlined below:

**1) Changes Effective Now**

I am happy to hear that the CEC is listening to feedback on the impact these new standards have had on the California Lighting Retrofit industry, but I am very concerned that most of us will be gone and out of business by the time that any new changes are implemented. It will be a shame to see hundreds and hundreds of people losing good-paying jobs. I urge, beg, and pray that you consider immediate action to adopt changes. If we wait until January 1, 2017 – there will be no one left doing lighting retrofit work in California. That will be a shame.

**2) Interior Lighting**

The new standards that were implemented last year had a profound and dramatic effect on Interior Lighting projects. Our company has basically abandoned these projects as the costs have tripled and customers can no longer afford to do them. I urge and beg you to adopt the language that **adds Exceptions for Alterations and Modifications such that Code is not triggered as long as the new or modified fixtures have at least 20 percent lower power consumption compared to the original fixtures.**



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### 3) Exterior Lighting

The new standards that were implemented last year also had a dramatic effect on Exterior Lighting projects. It is a shame that so many new LED products exist on the market – yet we can't install them because they don't comply with some aspects of the ridiculous new standards. I urge and beg you to **add an Exception for exterior fixture replacements such that Code is not triggered so long as replacement luminaires have at least 40 percent lower power consumption compared to the original luminaires.**

This issue is my top priority these days. My business is nearly out of business. I am available any day, any time to discuss the seriousness of this issue. I hope California makes the right decisions on these issues above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Neil Miller', with a long, sweeping underline.

Neil Miller  
CEO  
American Lighting