



1758 Orange Tree Lane  
Redlands, CA 92374  
909-335-1699  
909-335-5715 Fax

CALIFORNIA ENERGY COMMISSION

Attention: Docket No. 15-BSTD-01

Dockets Office

1516 Ninth Street, MS-4

Sacramento, CA 95814

March 13, 2015

[Docket@energy.ca.gov](mailto:Docket@energy.ca.gov)

[Adrian.ownby@energy.ca.gov](mailto:Adrian.ownby@energy.ca.gov)

California Energy Commission

**DOCKETED**

**15-BSTD-01**

TN # 75408

MAR 13 2015

To whom it may concern:

EnerPath has been engaged in energy efficient lighting retrofits and upgrades for more than 25 years. By now you have received numerous comments on the adverse effects of the 2013 Title 24, Part 6 as it pertains to non-residential lighting alterations. The catastrophic effects of these new 2013 regulations on the energy efficient lighting industry have been presented to you by many industry practitioners and we need not reiterate them here. Other industry leaders have illustrated the loss of energy savings, jobs and economic vitality. We too have painfully experienced these negative effects.

We voice our strong support for the proposed changes that are outlined in the 45-Day Language for 2016 Title 24, Part 6 as it pertains to non-residential lighting alterations (Section 141(b)2). This draft language would correct the negative consequences resulting from the enactment of the 2013 code. Additionally, in order to reduce barriers to the adoption of exterior solid state lighting, we support a similar exception for exterior fixture replacements to ensure code is not triggered as long as the exterior lighting upgrades have at least 40% lower power consumption.

**The importance of applying these corrections immediately cannot be overstated** as this action will put the energy efficient lighting industry back to work delivering robust energy savings, greenhouse gas reductions, and economic benefit to California.

Respectfully,

A handwritten signature in black ink, appearing to read "Jonathan Baty".

Jonathan Baty  
Vice President, Technology  
EnerPath Services Inc.