

Energy - Docket Optical System

From: Robert Ofsevit <robert@alamolighting.com>
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California Energy Commission

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CALIFORNIA ENERGY COMMISSION

Attention: Docket No. 15-BSTD-01

Dockets Office

1516 Ninth Street, MS-4

Sacramento, CA 95814

To Whom It May Concern:

I am writing again regarding the updated proposed changes to Title 24 lighting requirements. I want to share with you a personal note. Many Americans say they are against government regulation; In contrast, I have long supported regulations for the common good, like required miles per gallon fleet standards for cars, smog controls, and, over many years, a range of regulations for the lighting industry—*until now*. The CEC, in the case of current Title 24 lighting regulations has simply gone too far, mandating requirements that are completely at odds with the practical business of implementing energy-efficient lighting upgrades. Unfortunately, the net effect is reduced economic activity and less energy savings.

It is significant that constructive changes are finally being considered, *but they will be rendered moot unless implemented shortly*. We appeal to you act to act with the appropriate creative urgency required here, doing whatever is necessary to get this done. All the interested parties who wrote you, and the far greater number we represent, simply can't wait.

Accordingly, I fully support Version 9 of the proposed language for Indoor Lighting Alterations in its entirety. In particular, I feel the following *Exceptions* are critically important and should not be subject to further modification:

EXCEPTION 2 to Section 141.0(b)2I. "For work consisting of only luminaire replacements per ii above, where replacement luminaires have at least 20 percent lower power consumption compared to the original luminaires."

and

EXCEPTION 2 to Section 141.0(b)2J. "Replacement of luminaire components where the modified luminaires have at least 20 percent lower power consumption compared to the original luminaires."

In addition, I believe the proposed Wiring Alterations language in Section 141.0(b)2K properly applies daylighting controls to large projects only, while not creating barriers for small and medium projects where the associated costs are unacceptable to the retrofit market. This language should remain as currently proposed in Version 9.

It is also critical 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 luminaries. I am concerned that this arena is getting less attention than it deserves. The exterior fixture replacement market is a large, mostly untapped opportunity that would help us all meet our energy reduction goals. Unfortunately, this market, like the indoor market, has been choked off by Title 24 regulations and needs to be addressed with the same focus as interior spaces.

Thank you for your consideration.

Regards,

Robert Ofsevit

Vice President
Alamo Lighting