

CALIFORNIA ENERGY COMMISSION
Attention: Docket No. 15-BSTD-01
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814

California Energy Commission

DOCKETED

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TN # 75417

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I fully support Version 9 of the proposed language for Indoor Lighting Alterations in its entirety. In particular, we 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."

As well as

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 luminaires.

We appreciate efforts to revise Title 24 lighting rules, but cannot emphasize strongly enough the importance of implementing these changes right away. Every day that these rules stay in place is another day that potential savings will not be implemented due to added cost and difficulties be they perceived or real.

In addition as we in California lead the way in other states adopting our codes at later dates we do not want to make it difficult for other states that may not be as advanced as our installation forces are.

Thank you for your consideration.

Sincerely,

Damion J Remsberg

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