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March 17, 2015 | Submitted Electronically

California Energy Commission

Dockets Office, MS-4

Re: Title 24 "2016 Building Energy Efficiency Standards" – Docket No. 15-BSTD-01

1516 Ninth Street

Sacramento, California 95814-5512

California Energy Commission

DOCKETED

15-BSTD-01

TN # 75432

MAR 17 2015

RE: SCPPA Comments Regarding the February 13, 2015 Notice of Proposed Action on Proposed Revisions to the California Building Energy Efficiency Standards (Title 24, Part 1, Chapter 10, Part 6) – "2016 Building Energy Efficiency Standards" [Docket No. 15-BSTD-01]

The Southern California Public Power Authority (SCPPA) appreciates the opportunity to submit these comments to help inform proposed revisions to the Title 24 2016 Building Energy Efficiency Standards. We greatly appreciate the Energy Commission staff's efforts to "simplify and streamline" the nonresidential lighting control requirements. Doing so would support and encourage greater participation in the program, thereby achieving more significant energy efficiency savings across the State of California.

SCPPA is a joint powers authority consisting of eleven municipal utilities and one irrigation district. SCPPA Members deliver electricity to approximately two million customers over a 7,000 square mile area, with the total population of 4.8 million people. SCPPA members include the municipal utilities of the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside and Vernon, and the Imperial Irrigation District.

We strongly support the proposed Part 6 Section 141(b)2 revisions regarding non-residential lighting exceptions. The changes would provide an exemption to retrofit projects greater than 10 percent of floor space and over 40 fixtures, if the retrofit provides for a one-for-one exchange in the number of fixtures and there is no increase in wattage in the lighting alteration project. We greatly appreciate the Energy Commission staff's intent "to continue refining the language in this Section to improve clarity and would further recommend that the effective date of this change not be delayed until 2017. Making the change effective the same date as the 2016 Title 24 Building Energy Efficiency Standards revisions are adopted – or, better still, *retroactive to January 1, 2015* – would *encourage* development of a significant number of important energy efficiency projects across the State that may otherwise be stymied with the existing retrofit requirements left in place.

Earlier implementation of energy efficiency measures will avoid significant amounts of greenhouse gas emissions in pursuit of the State's goal to dramatically reduce our environmental footprint by 2050. Indeed, our Members have embraced energy efficiency as an effective means of both reducing emissions and our customer's electric bills.

Thank you for your time and consideration of our comments. We greatly appreciate the Energy Commission staff's significant efforts engage stakeholders towards revising the Title 24 standards and look forward to reviewing 15-day language that would address the recommendation described above. We join in support of comments submitted by the Northern California Power Agency and the California Municipal Utilities Association as well.

Respectfully submitted,

Tanya DeRivi

Director of Government Affairs