



California Municipal Utilities Association

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March 17, 2015

California Energy Commission
Re: Docket No. 15-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

15-BSTD-01

TN # 75434

MAR 17 2015

Re: NOPA, Proposed Revisions to the California Building Energy Efficiency Standards, CCR, Title 24, Part 1, Chapter 10, and Part 6 (Docket No. 15-BSTD-01)

Thank you for the opportunity to provide comments following the March 2-3, 2015, Energy Efficiency Lead Commissioner Hearings to discuss the 45-day language on California Energy Commission's (CEC) proposed regulatory language amendments to the Building Energy Efficiency Standards (Title 24 Codes & Standards, Docket No. 15-BSTD-01). Our comments support the suggested changes to Title 24, Part 6, Section 141.0, Nonresidential Lighting Alterations. With this support, we ask that the CEC reconsider adjusting the current language in the 2013 Title 24, Part 6, Section 141.0 et seq. and not wait until January 2017, when the 2016 Building Efficiency Standards go into effect.

The California Municipal Utilities Association (CMUA) represents the vast majority of California's consumer-owned utilities and members' interests on both energy and water issues. CMUA members have demonstrated leadership on environmental initiatives including, reducing the impacts of climate change, and implementing local utility energy efficiency programs. Our members annually report to the CEC on the effectiveness of their energy efficiency programs in meeting their 10-year energy savings targets. In our 2015 annual energy efficiency status report to the CEC, local utility programs spent nearly \$170 million, with almost half of the energy savings coming from lighting systems.

CMUA members discussed with CEC staff and management a few of the nonresidential lighting retrofit issues during the implementation of the 2013 Title 24 Codes & Standards, effective on July 1, 2014. We understood that there were a number of challenges in upgrading and retrofitting nonresidential lighting systems, due to language edits that severely limited new lighting upgrades. During the Title 24 implementation phase in 2014, we also heard concerns from multiple lighting contractors that the Title 24 language restricts lighting retrofits, which may ultimately reduce incentive dollars from our community-owned utilities, and reduce overall energy efficiency program effectiveness.

CEC's proposed changes to the 2016 Title 24 Codes & Standards, nonresidential lighting alterations focus on Part 6, Section 141.0(b)2I that simplifies and streamlines the requirements for lighting alterations – separating the lighting alteration, wiring alteration, and luminaire modifications, and reducing the multi-level or automatic control requirements.

The changes proposed by the CEC are a step in the right direction, as many lighting contractors agree with the suggested lighting retrofit language changes in their written comments to the CEC. We recommend that the CEC also consider a “reach-back” provision that modifies the 2013 Title 24 Code & Standards language to include the proposed language edits you have outlined for the 2016 Title 24 amendments. By allowing industry to use the newest Title 24 language on nonresidential projects today, sooner than the January 2017 implementation period, industry can begin replacing older, less efficient nonresidential lighting systems in California.

We look forward to continued dialog on the proposed Title 24 Codes & Standards changes, and look forward to working with the CEC on the next round of Title 24 Codes & Standards. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Tony Andreoni". The signature is written in a cursive, flowing style.

Tony Andreoni, P.E.
Director of Regulatory Affairs

cc: Dave Ashuckian, CEC Efficiency Division Deputy Director