



CALIFORNIA ENERGY COMMISSION

March 17, 2015

**Attention: Docket No. 15-BSTD-01**

Dockets Office

1516 Ninth Street, MS-4

Sacramento, CA 95814

The Sierra Business Council manages the Sierra Nevada Energy Watch which is an energy efficiency partnership with a California Investor Owned Utility. Over the past five years, the Sierra Nevada Energy Watch has provided energy efficiency projects to 1,600 businesses which have reduced their energy usage by 25 million kilowatt hours as a result of our projects. The current Title 24 code requirements have negatively impacted the implementation of our energy efficiency projects; therefore, the Sierra Business Council fully supports 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.”*

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 luminaires.

We appreciate the efforts to revise the Title 24 lighting rules. It is critical to implement the proposed changes immediately.

Thank you for your attention to this important matter.

Sincerely,

Jennifer A. Rosser

Program Director

Sierra Nevada Energy Watch