

March 20, 2015

California Energy Commission
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California Energy Commission

DOCKETED**15-BSTD-01**

TN 75495

MAR 20 2015

**Re: Docket # 15-BSTD-01 Proposed Revisions to Sec 130.1(e)
Demand Responsive Controls****As currently written:****(e) Demand Responsive Controls.**

Lighting power in buildings larger than 10,000 square feet shall be capable of being automatically reduced in response to a Demand Response Signal; so that the building's total lighting power can be lowered by a minimum of 15 percent below the total installed lighting power. Lighting shall be reduced in a manner consistent with uniform level of illumination requirements in TABLE 130.1-A. Spaces that are non-habitable shall not be used to comply with this requirement, and spaces with a lighting power density of less than 0.5 watts per square foot shall not be counted toward the building's total lighting power.

Comment:

1. Sec 100.1 Definitions does not contain a definition for "total installed lighting power".
2. With the increased use of LED luminaires, many installations find the lighting to be too bright and hence the high-end trim is often adjusted to be at 80 to 85% (a reduction of 15 to 20% from the nameplate label or the electrical connected load).
3. It is possible for a 11,000 square foot warehouse building to have 1,000 sf of office space illuminated at 0.75w/sf and 10,000 sf of warehouse space illuminated at less than 0.5w/sf in which case the warehouse is not required to have demand responsive controls and the 1000sf office is required to have demand responsive controls.

Suggestion:

1. Add a definition for “total installed lighting power”.
2. Exclude from the 10,000 square foot threshold the spaces that are illuminated at less than 0.5 watts per square foot.
3. Clarify whether the “non-habitable” spaces are to be excluded from the 10,000 sf threshold, are to be excluded from the total installed lighting power, or are to be excluded from the 15% reduction.
4. Clarify whether the 0.5w/sf is based on the nameplate label or on the high-end trim .
5. Exclude spaces whose high-end trim is below 85%.
6. Require a minimum of 15% reduction below the high-end trim adjustment.

Thank you for your consideration of these comments.

Respectfully submitted,

A handwritten signature in cursive script that reads "Richard N Miller".

Richard N. Miller, PE, LEED AP, IES, IA EI, IEEE, LC
President, RNM Engineering, Inc.