



Sunday, March 22, 2015

To: The California Energy Commission Building Energy Efficiency Standard Rulemaking Docket Number 15-BSTD-01 DOCKET@energy.ca.gov California Energy Commission DOCKETED 15-BSTD-01 TN 75504 MAR 23 2015

REGARDING

Proposed separate ON and OFF controls for daylit zones

COMMENTS

Following are proposed clarifications and additions to Section 130.1(a)

Section 130.1(a)4. Separately Controlled Lighting Systems. In addition to the requirements in Section 130.1(a)1, 2, and 3, <u>the following lighting systems shall each be functionally controlled with manually switched ON and OFF lighting controls:</u>

Rationale for proposed change:

There is confusion if this subsection requires separate ON and OFF controls. The proposed language is needed for clarity.

A. General lighting shall be separately controlled from all other lighting systems in an area.

B. Floor and wall display, window display, case display, ornamental, and special effects lighting shall each be separately controlled on circuits that are 20 amps or less.

C. When track lighting is used, general, display, ornamental, and special effects lighting shall each be separately controlled.

D. Luminaires in skylit daylit zones, primary sidelit daylit zones, secondary sidelit daylit zones, and non daylit zones shall each shall be separately controlled



Rationale for changes:

It is impossible to conduct an accurate daylight acceptance test if the daylit zone under test cannot be isolated from other daylit and general lighting, so that all other lighting that is not part of the daylight test must be able to be turned off to conduct an accurate test, in accordance with the other criteria in NA 7.6

Yours truly,

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