

March 29, 2015

California Energy Commission
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California Energy Commission

DOCKETED**15-BSTD-01**

TN # 75541

MAR 30 2015

Re: Docket # 15-BSTD-01 Resolution of Conflict in Lighting Power Density for Egress Lighting as used in Sec 130.1**As currently written:****Section 130.1 as currently written:****(a) Area Controls.**

1. All luminaires shall be functionally controlled with manually switched ON and OFF lighting controls. Each area enclosed by ceiling-height partitions shall be independently controlled.

EXCEPTION to Section 130.1(a)1: Up to 0.2 watts per square foot of lighting in any area within a building may be continuously illuminated during occupied times to allow for means of egress illumination, if:

(c) Shut-OFF Controls

1. In addition to lighting controls installed to comply with Sections 130.1(a) and (b), all installed indoor lighting shall be equipped with controls that meet the following requirements:

EXCEPTION 3 to Section 130.1(c)1: Up to 0.1 watts per square foot of lighting in any area within a building may be continuously illuminated, provided that the area is designated for means of egress on the plans and specifications submitted to the enforcement agency under Section 10-103(a)2 of Part 1.

EXCEPTION 5 to Section 130.1(c)1: Illumination provided by lighting equipments that is designated for emergency lighting, connected to an emergency power source or battery supply, and is intended to function in emergency mode only when normal power is absent.

Comment:

1. There is a discrepancy between **EXCEPTION to Section 130.1(a)1** and **EXCEPTION 3 to Section 130.1(c)1** in the allowable lighting power density that may be continuously illuminated.
2. There is a spelling error in **EXCEPTION 5 to Section 130.1(c)1**.

Suggestion:

1. Use a consistent value in both exceptions for the watts per square foot that may be continuously illuminated.
2. Verify that this value of the watts per square foot will be able to achieve not less than 1 footcandle at the walking surface as is required by California Building Code, Title 24, Part 2, Chapter 10, Section 1006 – Means of Egress.
3. In EXCEPTION 5 to Section 130.1(c)1: change “Illumination provided by lighting equipments that is designated . . .” to “Illumination provided by lighting equipment that is designated . . .”.

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, IAEE, IEEE, LC
President, RNM Engineering, Inc.