

Lighting & Watercon Supply

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California Energy Commission

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California Energy Commission

Dockets Unit

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Subject: Request to Clarify Certain Wording from Title 24-2013–Part 6–Sect 110.9(b)D

Gentlemen:

A specific recommendation I show below for an improvement of the 2016 version of Title 24 (**reference Title 24-Part 6 of the current year 2013 energy code under Section 110.9 – Mandatory Requirements for Lighting Control Devices and Systems, Ballasts, and Luminaires under item (b)D “Outdoor Astronomical Time-Switch Controls.”**)

In the new 2016 Title 24, Part 6 energy code, would you please change the wording from:

~~Outdoor~~ Astronomical Time-Switch Controls to **Astronomical Time-Switch Controls**

The reason for this request is because Astronomic Time-Switch Controls can be placed inside a building for controlling lights outside of a building via insulated electric wires inside conduit. Also, when you look at Astronomic Time-Switch controls from manufacturers who make them, you do not see the adjective “Outdoor” in front of the control. There will be no energy savings by requiring the Title 24 applicant place the Astronomic Time Switch Control in an outdoor housing when the design might be better served and safer having the Astronomic Time-Switch indoors.

I encourage you whenever possible to continue to look for ways to simplify the energy efficiency code rather than making it more complex with so many details. With the dual task of making the energy code more stringent to save energy and making it more understandable, the Commission will better achieve its purpose.

I would advise keeping the “**fixture modification in place**” category, that was new in the Title 24 Part 6 Section 141– year 2013, in the new versions of Title 24 Part 6. “Fixture modification in place” can simplify and encourage energy efficient improvements.

Thank you.

Gary Smith, LC

Gary Smith

Lighting Design and Specification