

# Docket No. 15-BSTD-01

April 9, 2015, 8<sup>th</sup> letter

## Is There Any Benefit of Title 24 for Lighting Retrofits?

Greetings

If anybody can tell me at least one benefit of Title 24 for lighting retrofits, please let me know, because I cannot think of any.

Does Title 24 save energy in lighting retrofits?

The answer is definitely no for two reasons.

1. The existing one has substantially reduced the number and size of projects.
2. Even for projects that were done, most lighting retrofitters typically got lower LPDs than maximally allowed by Title 24, because they know that cost effective energy savings help end-customers approve projects. For example, it is quite easy to get down to at least .4 WSF for ambient lighting in offices if there are good task lights. Also most lighting retrofitters know that automatic controls often do not save energy cost effectively and sometimes automatic controls can actually increase energy use.

**Not only that I cannot find one good benefit of Title 24 for lighting retrofits, Title 24 is an obstacle for lighting retrofits, because it increases time and costs without saving extra energy. So why are we burdened by it?**

Especially with the greatly reduced amount of hydroelectric production in California due to the drought, we need to reduce as much KWH cost effectively as possible.

Keeping some people at the CEC employed and Jim Benya getting paid as a consultant are not really good benefits in the big picture, especially for California residents, whose tax dollars pay these people.

So anybody, please tell me why one of these three options should not be done regarding Title 24 and lighting retrofits.

1. Totally exclude lighting retrofits from Title 24.
2. Approve the previous 45-day language.
3. Approve something like if wattage is reduced by at least 20% from CFLs and at least 40% from anything else, Title 24 is not triggered for both interior and exterior applications.

The CEC should admit it totally screwed up and allow the free market, including lighting professionals and end-customers, decide what is best for each specific project.

**A number of stakeholders, including me, tried very hard during planning of the existing Title 24 to get the CEC to dramatically change it, but the CEC was so self righteous and arrogant, telling us over and over they knew best. Well now everybody knows they did not know best. But the CEC is still resistant to fully accepting what we stated then and have recently been stating.**

California Energy Commission

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Since the CEC has caused lighting companies to make less profit or lose money, people to lose their jobs, and many projects not being done or not done the best way, is the CEC incompetent and/or do they have some agenda, such as trying to save face? Maybe the governor or somebody else should review the CEC.

You can email or call me 10 AM or later Pacific time during daylight savings time, which is 7 AM or later here in Hawaii. Thanks for your consideration.

Stan Walerczyk

Stan Walerczyk, HCLP, CLEP  
Principal of Lighting Wizards  
Chair of Human Centric Lighting Society and Committee  
<http://lightingwizards.com/>  
<http://humancentriclighting.org/>  
[stan@lightingwizards.com](mailto:stan@lightingwizards.com)  
808-344-9685