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Submitted via email: docket@energy.ca.gov

Mr. Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth St.
Sacramento, CA 95814

California Energy Commission

DOCKETED

15-BSTD-01

TN # 75655

APR 27 2015

Proposed Revisions to the California Building Energy Efficiency Standards California Code of Regulations, Title 24, Part 6 and Appendices; 45-Day Language

Dear Commissioner McAllister,

We believe the CEC has been a leader in improving the energy efficiency of lighting in non-residential buildings and current language for T24 2016 is eroding the effectiveness of the CEC in advancing lighting efficiency for the future. Luminaires, Controls and Commissioning are all hitting levels of critical mass so that economies of scale will drastically improve private-sector economies within a short time horizon.

ProAutomated provides comprehensive, strategic and customized lighting solutions to both commercial and residential clients. We design and implement advanced lighting strategies specifically developed to reduce our clients' total energy consumption and costs, as well as improve the quality of their space's appearance and usability.

ProAutomated supports increasing the standards for lighting controls implementation and acceptance testing as a way to improve the environment, provide additional jobs, and reduce electricity usage in the State of California. ProAutomated has seen our work increase substantially in California and continues to hire to fill the need for implementation, commissioning and acceptance testing of lighting projects in California.

Please contact me to discuss these comments in more detail.

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Section 141.0(b)2

The new standard of only 20% improvement in power consumption over existing fixtures is too low, and will not support changes beyond what existing economics incentivizes. We strongly support raising this to a minimum of a 50% improvement in lighting efficacy in order to push the state forward as a leader in energy efficiency. We believe the 50% threshold is necessary in order to move to either LEDs or greater lighting control. The 50% threshold is already viable for many projects, and will only become more so as component pricing is rapidly falling.

Exception to Section 141.0(b)2

The current language regarding "20 or fewer controls" should be modified to reflect a measurement that is less ambiguous. As currently stated, would a lighting panel with 24 dimming zones and only 1 wall control be classified as 24 controls or only 1? We recommend switching to a measurement based on wattage affected. This is unambiguous and ensures that the high-level goal of minimizing wasted energy is met.

Exception 2 to Section 141.0(b)2J

Requiring only a 20% improvement over current power consumption does not push the standards of the state of California beyond what is widely available today. This standard should be increased to 50% in order to have a notable impact on the direction of energy usage in the state.