

California Energy Commission
Attn: Docket 15-BSTD-01
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814

California Energy Commission

DOCKETED

15-BSTD-01

TN # 75670

APR 30 2015

Re: Docket No. 15-BSTD-01; Proposed Amendments of Section 141.0(b)(2) and Table 141.0-E

I'd like to thank you, the California Energy Commission, for all the hard work you've done to create Title 24 – especially the lighting and lighting controls sections in Part 6. We know there has been opposition to controls but we support you and we support lighting controls because they work.

What we don't support is the idea that controls regulations should be scaled back or watered down. We've heard about the following series of proposals and we want you to know that we strongly oppose these: (1) increasing the percent of luminaire replacements that would trigger Section 130.1 (a), (b), (c) and (d) control requirements from 10% of existing luminaires to 20% of existing luminaires; (2) exempting alterations from acceptance test requirements when 20 or fewer controls are added; (3) exempting luminaire modifications from any multi-level, shut-off or daylighting control requirements.

I also do not support:

- Exempting luminaire alterations or modifications from existing lighting control or lighting power allowance requirements where the modified luminaires have at least 20 percent lower power consumption compared to the original luminaires.
- Any type of rolling back of acceptance test requirements or reducing lighting controls for alterations and modifications in existing buildings of either indoor and/or outdoor lighting fixtures.
- Any changes to the wiring alteration requirements that would scale back the current Title 24 Part 6 lighting control, or acceptance test requirements.

We need the powerful energy saving technology of lighting controls in both new and existing buildings. While it may be easier to meet code on a new building, lighting controls and other high efficiency solutions in existing building are critical to California's greenhouse gas (GHG) goals. New buildings are a small percentage of the total building stock. There is approximately 8 billion sq. feet of existing, non-residential space in CA. Without substantial deep energy efficiency retrofits of existing buildings - utilizing comprehensive controls - CA will not meet the goals of AB32, or Gov. Brown's state-of-the-state energy efficiency objectives. Shallow retrofits with no verification are an obstacle, not a solution, to meeting these energy efficiency goals. Once these shallow retrofits are installed, deeper energy saving opportunities will be lost for years to come.

Cost (or Expense) is often cited as a factor when contractors miss the opportunity to stress life cycle costing of the upgrade. Contractors need to emphasize the long term return on investment of deeper retrofits. Sure, selling a shallow lamp or luminaire change is easier but it's not what is needed to achieve the substantial energy efficiency targets set by Governor Brown.

Please do not dig yourself a deep hole by rolling back these standards!

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Chris Smith', with a stylized, cursive script.

Christopher Douglas Smith
Alternative Energy Solutions Engineer
Statewide LMCC