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California Energy Commission  
Attn: Docket 15-BSTD-01  
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California Energy Commission

**DOCKETED**

**15-BSTD-01**

**TN # 75671**

**APR 30 2015**

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

To whom it may concern:

We've heard that the Energy Commission is considering a number of proposals that would weaken current lighting control requirements, including: (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; and (4) 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.

Lighting controls can double the energy savings over just putting in more efficient luminaires. By doubling the percentage of replacements that trigger lighting control requirements and allowing wholesale exemptions for lighting luminaires that reduce power consumption by 20 percent, the Commission is losing a huge amount of energy savings that would be achieved under the current code. Providing a blanket exception for acceptance testing for certain installations is also shortsighted. A 2011 evaluation of Title 24 effectiveness found that automatic day-lighting controls failed in 7 out of 7 tests, and occupancy sensors failed in 2 out of 3 tests. All of the failures were due to design, installation, or calibration issues. Allowing shallow retrofits with no verification will only lock in inefficient lighting systems for years to come.

I've heard that retrofit companies that only do lamp and ballast changeouts are behind the push to weaken current requirements to install lighting controls during retrofit work on the grounds that these requirements negatively affect their business model. We have experienced strong consumer satisfaction with lighting control installations and have found the 2013 code requirements to have increased demand for lighting control work and to have resulted in reduced costs for these controls.

Energy-efficiency is an important for California's Clean Energy Future, economic development and combatting global warming. I thank the commission for accepting my comments.

Best Regards,



Kirk Story  
Principal, Operations Director  
Stockman's Water & Energy