



California Energy Commission

DOCKETED

15-BSTD-01

TN # 75672

APR 30 2015

California Energy Commission

Attn: Docket 15-BSTD-01, Dockets Office

1516 Ninth Street, MS-4

Sacramento, CA 95814

Re: Docket No. 15-BSTD-01;

Proposed Amendments of Section 141.0(b)(2) and Table 141.0-E

We appreciate this opportunity to comment. Our company, [Pacific Ridge Electric inc.](#) has been in the electrical contracting business since 1993. We do a significant number of lighting retrofits and support the Commission's Title 24 energy efficiency goals and regulations.

We are opposed to the proposed rollback of acceptance testing and lighting control requirements. We also oppose the proposed alterations and modifications of both indoor and outdoor luminaires of existing buildings.

We oppose the following:

- (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% lower power consumption compared to the original luminaires.

We oppose all of the above proposals and any other proposals that the Commission may be considering that would weaken lighting control or acceptance test requirements for alterations and modifications of indoor or outdoor lighting efficiency. We would also like to clearly state our opposition to any changes to the wiring alteration requirements that would reduce current control requirements.

We oppose the rollback of current lighting control requirements for existing building retrofit work. Initially 2013 title 24 part 6 scared us a little because of all the new technology required. But, like with every code update, we gave our people the training necessary to get up to speed. We took classes, we got our people CALCTP certified, and our company and installers became Acceptance Testing certified. The result surprised us! We are now a much more capable and expert company; we do a better job for our customers and create much more energy savings.

The Title 24 challenge has made us a better company and given our employees more and better work, higher skills, and better prospects for their careers. Rolling back the current lighting control and lighting control acceptance test requirements for existing buildings will punish companies like ours who made the investment needed to comply with the 2013 code. The 2013 code increased demand for lighting control retrofit work, resulting in reduced costs for customers and a return on investment for those contractors who spent resources educating their workers on these new requirements. The result of the proposed rollback will be lost energy savings and lost lighting control installation jobs.

I don't understand the cost argument for weakening lighting control requirements for alterations and modifications. The current requirements have pushed manufacturers continue to innovate and reduce costs. For Title 24 part 6, advanced lighting controls, there are many more suppliers and many more systems available than there were in 2013. More and more of them are being introduced all the time and costs are dropping as well.

As a result, the cost effectiveness of these measures for building owners has only increased since they were adopted in 2013.

Let's not regress...

The Commission should continue to reinforce and enhance the regulations for lighting controls.

I sincerely hope that the CEC will strongly consider the implication of weakening the code. We are grateful for this chance to express our concerns.

Best Regards,

Chris Doyle

Project Manager

Pacific Ridge Electric inc.
