

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

May 4, 2015

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

We've seen that the Energy Commission is considering a number of proposals that would reduce 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.

Contra Costa Electric, Inc. is opposed to the proposed revisions and any others that the Commission may be considering that would lessen lighting control or acceptance test requirements for alterations and modifications of outdoor or indoor luminaires. We also oppose any changes to the wiring alteration requirements that would reduce current lighting control requirements.

We feel that the Commission is on the right track with the 2013 Title 24 energy efficiency regulations on existing buildings for both indoor and outdoor lighting controls. We support the Commission is maintaining high efficiency requirements for lighting controls.

The proposed changes encourage building owners and landlords to stagger retrofits over a five year period in order to avoid lighting control requirements and allow shallow lamp and ballast change outs only. Please do not let an organized effort by companies that only do lamp and ballast change outs persuade you to eliminate lighting control requirements just because these

requirements do not meet their business model. There are plenty of retrofit companies that also install lighting controls. Those that have not been able to keep up with the changing code requirements need to evolve and hire personnel qualified to install both lamps and ballasts and lighting controls. California's energy future depends on it. Moreover, the elimination of acceptance tests for smaller installations essentially ensures that most installations will not function as intended. Studies have shown that the majority of lighting control installations not subject to acceptance tests fail to perform acceptably.

The complaints about cost and complexity regarding compliance with the 2013 lighting control requirements for alterations and modifications is overblown. Lighting control costs for area controls, multi-level lighting controls, shut-off controls and automatic daylight controls have been going down, not up. In addition, advanced lighting control manufacturers are supplying code compliant equipment, provide design support, and engineering assistance at little or no cost. Contractors who are not aware of this should spend more time educating themselves about controls, suppliers, and vendor services.

I hope my comments do not fall on deaf ears. Do not make changes to the code because of cost and complexity complaints. It will most certainly be regretted later.

Sincerely,



Ray Robertson, P.E., LEED A.P.

Vice President, Engineering and Renewables

Contra Costa Electric, Inc. an EMCOR Company