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California Energy Commission  
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California Energy Commission

**DOCKETED**

**15-BSTD-01**

**TN # 75711**

**MAY 07 2015**

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, JO Electric has been in the electrical contracting business for more than 11 years. 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 percent 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.

As a Contractor, I am surprised to hear that lighting retrofit companies are seeking to roll back current lighting control and acceptance test requirements for lighting control alterations and modifications. This is directly contrary to the direction of the Governor to adopt building standards that will substantially reduce energy consumption. The Governor's goals cannot be met by watering down existing lighting control and verification requirements. The problem with shallow retrofits is that they lock in shallow energy savings for years to come. In my experience, the 2013 code requirements have pushed our industry forward and have resulted in increased consumer satisfaction.

I waited with baited breath on your final decision. Please do not change the code. The industry will adapt as it always has.

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.

Best Regards,

A handwritten signature in black ink, appearing to read 'JO' with a stylized flourish.

Jimmy Ortega  
President  
JO Electric