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California Energy Commission

DOCKETED

15-BSTD-01

TN # 75714

MAY 07 2015

Via email:

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May 7, 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

To the California Energy Commission:

The International Brotherhood of Electrical Workers represents some 700,000 members nationwide and was founded more than 100 years ago. I represent the 2,000+ members of IBEW Local Union 441 in Orange County.

The IBEW's Inside Branch represents wiremen who install the electrical systems in residential, commercial and industrial buildings. It requires five years of apprenticeship and on the job training for someone to call themselves an IBEW Inside Wireman, insuring that your home, office or workplace is a safer place to be.

It has come to our attention that the CEC has proposed a number of revisions to the upcoming 2016 title 24, part 6 code, which would exempt certain projects from lighting controls. **IBEW Local 441 opposes any rollback of CEC requirements of lighting controls in the code for 2013 or 2016. IBEW Local 441 supports stronger energy efficiency code measures and the additional use of lighting controls for 2016.**

We also understand that supporters of code weakening have stated that lighting controls are somewhat expensive, and that might be an obstacle to adoption. Our response to such arguments:

- Lighting controls are becoming easier to utilize and less expensive every year. Increased volume of control use and manufacturing reduces cost – much like the way big screen TVs have dropped in price. Increasing the use of controls (not decreasing as proposed for 2016) saves more energy and brings costs down.

PG&E's comments on the proposed lighting control reductions (please see attached summary) contradict those who say the CEC should lessen lighting control requirements. According to PG&E, 2013 code requirements have resulted in an increase in lighting alteration work (not a reduction).

In addition, PG&E found that the proposed 2016 changes would ***"increase electricity consumption enough to offset all of the electricity savings from both residential and nonresidential measures proposed for 2016."***

With PG&E's findings in mind, we urge the CEC to change course and not weaken the 2013 or 2016 Title 24 code requirements for lighting controls in retrofitted or new buildings.

For the 2016 code IBEW Local 441 is specifically opposed to 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.

We oppose exempting alterations from acceptance test requirements when 20 or fewer controls are added, and opposes exempting luminaire modifications from any multi-level, shut-off or daylighting control requirements.

We oppose 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 any other proposals that the Commission may be considering which would lessen lighting control or acceptance test requirements for alterations and modifications of indoor or outdoor luminaires in the 2016 code. We also oppose any changes to the wiring alteration requirements that would reduce current control requirements in the 2016 code.

IBEW Local Union 441 appreciates the work of the Commission and this opportunity to express our position on Title 24, part 6. Thank you.

Sincerely,


Richard Samaniego
Business Manager

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Attachment

PG&E SUMMARY

PG&E Comments on 15 Day Proposed Changes to Nonresidential Lighting Retrofit Requirements in 2016 Title 24 Standards

CEC Docketed April 24, 2015

Docket #:15-BSTD-01 2016 Building Standards Update

Executive Summary and Recommendations

The Pacific Gas and Electric Company (PG&E), as a California Investor Owned Utility serving over 9 million customers, understands the concerns of the lighting retrofit industry about the applicability of the CEC's current lighting efficiency codes to retrofit work. Since PG&E is authorized by the California Public Utilities Commission to operate both demand side management codes and standards advocacy and incentive programs, it is also in a unique position to analyze the impacts of changes to the code that might be made to accommodate the industry's concerns.

The following report analyzes the energy savings impacts of changes currently being considered by the CEC. It estimates that that the proposed reduction in stringency would result in changed code requirements that allow retrofit lighting energy consumption to be 253 GWh/yr higher for each year's retrofit construction activity as compared to the current energy code. At the end of a three year code cycle, we expect the allowed retrofit energy consumption to be 759 GWh/yr higher than the current code.

In comparison, CEC staff is proposing four residential energy efficiency measures for inclusion into the 2016 Title 24 standards with an estimated savings of 127.3 GWh/yr and 9.3 Million therms and ten nonresidential measures with an estimated savings of 127.6 GWh/yr of electricity and 3.2 Million therms of natural gas. Total statewide savings for new proposed measures is 255.0 GWh/yr and 12.5 Million therms.

In effect, the proposed lighting retrofit changes would increase electricity consumption enough to offset all of the electricity savings from both residential and nonresidential measures proposed for 2016. Using a 3 to 1 source energy multiplier, the proposed nonresidential source energy savings are 16 Million therms, and the proposed nonresidential source energy savings losses due to the retrofit lighting proposal are 26 Million therms.

As a matter of public policy, process, and precedent, PG&E recommends that the Commission not make any changes to the current codes that would result in a loss of savings. Such changes may not merit a negative environmental impact declaration and may not allow the CEC to continue to make the required determination to the US Department of Energy that their energy efficiency standards for commercial buildings are at least as stringent as the ASHRAE 90.1 standards. The ASHRAE Standard 90.1-2010 significantly increased stringency by requiring that retrofitted systems where more than 10% of the lighting is retrofitted comply with lighting power density and a limited number of automatic control requirements.