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

California Energy Commission

DOCKETED

15-BSTD-01

TN # 75715

MAY 07 2015

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

Our organization represents a significant amount of lighting controls and related energy efficiency work. We want to clearly state our firm's support of the CEC's 2013 Title 24, Part 6 energy efficiency regulations and objectives.

We are very concerned about the idea of weakening acceptance testing and lighting control requirements for 2016 and are opposed to it. For existing buildings, we are also opposed to the proposed alterations and modifications of both outdoor and indoor light fixtures/ballast/lamp equipment.

To be clear, we are opposed to all of these ideas:

- Increasing the percentage 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
- Exempting alterations from acceptance test requirements when twenty (20) or fewer controls are added
- Exempting luminaire modifications from any multi-level, shut-off or daylighting control requirements
- Exempting luminaire alterations or modifications from existing lighting control or lighting power allowance requirements where the modified luminaires have at least twenty (20) percent lower power consumption compared to the original luminaires.

We are also opposed to any other similar ideas that the CEC may be looking at for 2016. These ideas would weaken lighting control and/or acceptance test requirements for alterations and modifications of indoor or outdoor luminaires. In addition, we have considered that the CEC may be thinking about reducing wiring alteration requirements that would reduce current control requirements – we think that is a bad idea, too.

We would like to thank Energy Commission for what has been accomplished so far. We encourage you to go forward and not backward on indoor and outdoor lighting control requirements for 2016.

We genuinely appreciate the opportunity to comment on these changes and please do not reduce the codes and standards.

Lighting is the biggest opportunity to save energy - roughly twice that of air conditioning - on an annual basis. While LEDs can save 20% or more of lighting energy, controls essentially DOUBLE the savings. The 2013 code requirements for vacancy controls, daylighting and other controls must continue and expand for 2016. Going backwards is not an option.

Initial expenditure is often cited as a factor when contractors miss the opportunity to stress life cycle costing of the upgrade. Contractors need to emphasize the long term return on investment of deeper retrofits. Sure, selling a shallow lamp or luminaire change is easier but it's not what is needed to achieve the substantial energy efficiency targets set by our Governor Brown.

I applaud your effort to take public input regarding this matter. It is certainly important.

Best Regards,



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