



San Diego Chapter

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Date: May 8, 2015

California Energy Commission

DOCKETED

15-BSTD-01

TN 75723

MAY 07 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 Whom It May Concern:

The National Electrical Contractors Association (NECA) has provided over a century of service to the \$130 billion electrical construction industry that brings power, light, and communication technology to buildings and communities across the United States. The San Diego Chapter was chartered in 1942 and today represents more than one hundred electrical contractors in San Diego and Imperial counties, California.

San Diego NECA opposes the proposed rollback of lighting control and acceptance test requirements for alterations and modifications of indoor and outdoor luminaires in existing buildings 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. We also oppose 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 luminaires such as any changes to the wiring alteration requirements that would reduce current control requirements.

The most compelling statement has been made by PG&E in their comments which were docketed by the CEC on April 24, 2015. We would draw the Commission's attention to the following quote from PG&E: "... 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."

San Diego NECA agrees with PG&E's assessment of the potentially detrimental consequences of weakening Title 24 Part 6 for 2016. We respectfully urge the Commission to expand, not reduce, regulatory requirements for lighting controls.

Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Berg", with a stylized flourish extending to the right.

Andrew Berg

Executive Director

NECA San Diego Chapter

Representing over 100

Union signatory electrical contractors