



Orange County Chapter

NATIONAL ELECTRICAL CONTRACTORS ASSOCIATION

May 8, 2015

Via Email

Chair Robert B. Weisenmiller, Ph.D.
California Energy Commission
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814

California Energy Commission

DOCKETED

15-BSTD-01

TN # 75725

MAY 08 2015

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

Dear Chair Weisenmiller and Members of the Energy Commission,

The Orange County Chapter of the National Electrical Contractors Association (NECA) represents some of the largest electrical contractors in California. Many of our members have been in business for decades and have helped build the infrastructure that has powered our state's dominance as a center for commerce, industry, and education.

According to PG&E (comments docketed by CEC April 24, 2015), the proposed changes to the 2016 Title 24 would greatly increase energy consumption: "... 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."

Orange County NECA agrees with PG&E and opposes the proposed rollback of lighting control and acceptance test requirements for alterations and modifications of indoor and outdoor luminaires in existing buildings. We oppose: (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.

Thank you for your consideration of this important issue to our state's energy future.

Sincerely,

Peggy Brown
Executive Manager