



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

California Energy Commission

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15-BSTD-01

TN # 7571 G

MAY 11 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. Guillen Electric Company has been in the electrical contracting business for just a couple of years; however, my personal background goes well beyond 30 years in the industry. 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.

Shallow retrofits, meaning lamp and ballast change-outs, have been done for years and will not be sufficient to reach California's energy goals. The addition of controls



roughly doubles the energy savings of a shallow lamp & ballast job. Controls are as critical in existing buildings as they are in new ones. Those involved with energy efficiency projects, work hard to initiate an energy efficiency job, and property owners are usually only willing to retrofit once every 7 – 15 years. Because that represents only one bite of the apple during that time, we must make it count and we must verify installations perform as claimed.

The proposed changes are misguided and will damage California's ability to meet Governor Brown's goal of doubling the energy efficiency in existing buildings. Lighting controls can double the energy savings from a retrofit. In addition, studies have shown that without acceptance testing, advanced lighting systems will likely not provide expected savings. We should not be encouraging more shallow and unverified retrofits. We should be making sure that the retrofits that are done are deep and effective, and will result in substantially greater energy savings. We do not agree with the assertion that the higher initial costs of requiring controls and acceptance testing are creating a barrier to achieving retrofit savings. We support continued strong code requirements for lighting controls in both new and existing buildings, indoors and outdoors, for 2016.

Respectfully,

Julio R. Guillen ~ President
Guillen Electric Company