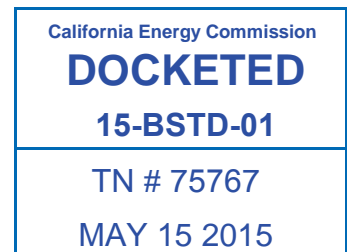




Sunday, May 14, 2015

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



SUBJECT: Docket No. 15-BSTD-Q1; Proposed Amendments of Section 141.0(b)(2) and Table 141.0-E

COMMENTS

National Lighting Contractors Association of America and its Lighting Retrofit Contractors **approves the proposed rollback of lighting control and acceptance test requirements for alterations and modifications of indoor and outdoor luminaires in existing buildings.** We approve: (1) increasing the percent of luminaire replacements that would trigger Section 130.1 (a), (lb), (c) and (d) control requirements from 10% of existing luminaires to 20% of existing luminaires; (2) exempting 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.

Why does NLCAA an ATTCP approve this roll back? California Energy Commission has an amazing record reducing energy consumption in California by supporting programs such as lighting retrofit. The advancement in LED lighting is a directly related to the programs that the Energy Commission helped put in place. NLCAA believes that the advancement in lighting has to be supported by increasing the market of lighting retrofit. Increasing the cost of a lighting retrofit by adding lighting controls will lose the potential of further reduction of energy consumption in California. Lighting Retrofit is still the low hanging fruit of energy reduction.

NLCAA is dedicated in helping California reduces energy consumption by the most effective method.

Yours truly,

Vice President of Training
NLCAA - ATTCP