

**Energy - Docket Optical System**

**From:** Mark Spahn <markspahn@mylightingcompany.com>  
**Sent:** Wednesday, June 03, 2015 11:04 AM  
**To:** Energy - Docket Optical System  
**Subject:** 15-BSTD-01" and indicate "Adoption of 15-Day Language for the 2016 Energy Efficiency Building Standards

We all Appreciate the willingness of the CEC to work with us on the 2016 Title 24 Code and to try to implement these changes as early as possible, in order to restore the Lighting Retrofit Industry for Small to Medium Businesses in the State of California.

I am in agreement with the following Ecology Action Statements and have added a few comments of my own.

Although, we would much prefer a 2016 Code that has fewer mandatory controls requirements for lighting retrofits than those proposed in the 15-Day Language. These additional Control requirements and the Cost of these controls have directly resulted in a reduction in overall energy savings statewide and in addition to hundreds, if not thousands of Jobs Lost since Title 24 2013 was implemented on July 1, 2014. Despite the disagreement, we feel that the 15-Day Language represents an acceptable compromise that will enable us to survive and rebuild the Industry, so that the jobs and energy savings that have been lost since last July can be realized. We therefore support the 15-Day Language.

We also strongly disagree with the inaccurate and misleading allegations voiced by Big Labor that understates the severe consequences imposed by the 2013 Code and that disparages the good work being done by non-union lighting retrofit contractors and the program implementers and customers who employ them. As a Non-Union Lighting Contract that has worked on more than \$30MM in projects for Small to Medium Sized Businesses over the past 15years, Big Labor's arguments are unsupported by real evidence and should be discounted given that their work does not focus on lighting retrofits for Small and Medium Business customers and reflects a lack of knowledge in these markets.

In Addition, since parity with 2013 is exceeded, it is incumbent and imperative that the CEC allow the 2016 Code to be implemented by stakeholders as soon as possible after it is adopted, rather than waiting until January 1, 2017. This is the only way to Repair and to Restore the Retrofit Industry in California and to Maximize Energy Savings Necessary to Achieving the Energy Savings Goals of the State of California.

I hope that you will support the 15 day language in its Current format. Thank You again for your Consideration in this matter.

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