



Schneider Electric U.S.A.

June 5, 2015

Submitted via email: docket@energy.ca.gov

Mr. Andrew McAllister, Commissioner
California Energy Commission
Docket No. 14-BSTD-01
1516 9th Street
Sacramento, CA 95814

California Energy Commission

DOCKETED

15-BSTD-01

TN # 75882

JUN 05 2015

Subject: Docket No. 15-BSTD-01 - Adoption of 15-Day Language for the 2016 Energy Efficiency Building Standards California Code of Regulations, Title 24, Part 6 and Appendices

Dear Commissioner McAllister,

As a global specialist in energy management, Schneider Electric offers integrated solutions across multiple market segments, including in utilities, infrastructure, industry, buildings, and data centers. As part of a major presence in the United States, in California we have approximately 2,600 employees at more than two dozen facilities. We also support thousands of additional direct and indirect jobs in California by working with more than 270 vendors and suppliers located throughout the state.

Schneider Electric is grateful for the opportunity to participate in this discussion and welcomes the opportunity to offer the following comments and observations on the 15-Day Language to be considered for inclusion in the 2106 Residential and Nonresidential *Building Energy Efficiency Standards* (2016 Standards) (California Code of Regulations, Title 24, Part 1, Chapter 10, and Part 6, and supporting language). If you have any questions, please contact me.

Sincerely,

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Section 130.5(b) – Separation of Electrical Circuits for Electrical Energy Monitoring

Add an exception that provides compliance for an installed metering system.

We agree with the 15-Day language that clarifies the intent of this section is to require loads be separated for the convenience of measurement and the future addition of meters. However, we respectfully submit that metering systems installed at the time of construction also meet the intent of the section. In fact, an installed metering system goes beyond the intent of the requirement and will actually reduce energy usage by providing actionable and timely energy consumption data to the building owner and operator. Therefore, it is respectfully suggested that an exception be given to buildings that have a metering system installed. This suggested revision is shown below in red with strikethrough and underline.

130.5(b)

EXCEPTION 2 to Section 130.5(b) Buildings for which a complete metering and measurement system is provided that measures and reports the loads called for in accordance with TABLE 130.5-B.