

Energy - Docket Optical System

From: Kramer, Leslie <lfkramer@stanford.edu>
Sent: Friday, June 05, 2015 6:05 PM
To: Energy - Docket Optical System
Subject: Docket number 15-BSTD-01 : Support for Adoption of 15-Day Language for the 2016 Energy Efficiency Building Standards

California Energy Commission

Dockets Office, MS-4

Re: Docket No. 15-BSTD-01

Adoption of 15-Day Language for the 2016 Building Energy Efficiency Standards

1516 Ninth Street

Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

15-BSTD-01

TN # 75887

JUN 08 2015

Comments of Stanford University Facilities Energy Management Supporting Adoption of Title 24 2016 15-Day Language

We are in support of the 15-Day language for the 2016 Energy Efficiency Building Standards. Stanford's group rebalasting program has been stalled for eight months due to the requirements related to modifications-in-place in the 2013 standards. That represents over 400,000 kWh/year in energy savings that we have not been able to realize. We have other pending lighting retrofit projects that will reduce lighting system wattages by over 20% that are also on hold. We are not surprised that the CEC's analysis is predicting more energy savings from the 15-Day language than the original standard, because we have found it difficult to make the economics work on group rebalasting projects and other lighting upgrades where we have to absorb the cost of non cost-effective control strategies. In other words, the current requirements of the 2013 standard as it applies to rebalasting projects increases the paybacks to a point where we are more likely to opt for "do nothing" than to make investments in upgrading the efficiency of lighting systems on campus.

Leslie Kramer

Manager, Energy Retrofit Programs

Facilities Energy Management

Stanford University

327 Bonair Siding, 1st Floor

Stanford, CA 94305-7272

Tel 650-725-5388

Cell 415-608-2335

Fax 650-721-3323

lfkramer@stanford.edu