June 4, 2015

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

RE: Docket 15-BSTD-01: New Compliance Path for Lighting Alterations and Modifications, Section 141.0, subsections (b)2I, (b)2J & (b)2K.

My name is Michael Stone, I have 25 years of inspection experience with the Cities of Monterey, Salinas and Watsonville. I am also the Secretary of the Northern California Chapter of the International Association of Electrical Inspectors.

I am writing in <u>opposition</u> to the proposed new language in Section 141.0(b)2I(ii). The proposed new language in this section allows lighting controls to be eliminated when an entire luminaire alteration is performed if the new luminaires are at least 30 percent more efficient than the existing luminaires.

This provision would be impossible for enforcement personnel to verify and enforce since the baseline value of the existing luminaires could not be established. When a retrofit building permit is issued, the first site visit by an inspector is to inspect the rough installation, including any new wiring. At this stage of a construction project, all demolition is typically completed and the debris is gone.

Advanced lighting controls such as daylighting and multi-level dimming are key to reducing energy consumption in any type of building. When an alteration occurs in an existing building is the best time to ensure that this important piece of energy efficiency infrastructure is put in place for the life of the building. Having an option to not install advanced controls should not be considered.

I urge the Commission to continue to promote energy conservation and <u>not approve</u> the proposed language in Section 141.0(b)2I(ii).

Sincerely,

Michael Stone
Secretary
International Association of Electrical Inspectors
Northern California Chapter

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