

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

Comments of Pursell Construction Inc dba LUMENATURE Supporting Adoption of Title 24 2016 15-Day Language

Lumenature is an electrical contractor operating in Santa Clara, San Benito, Santa Cruz, and Monterey counties. We specialize in providing energy efficient lighting modifications to existing lighting of PG&E customers to help reduce the energy load on California's energy grid.

Lumenature wholeheartedly supports the proposed changes that are outlined in the 45-Day Language for 2016 Title 24 Part 6. The proposed language is reasonable and consistent and is a huge improvement over the 2013 Code which has made customers reluctant to install energy efficient lighting because the burden and expense of the code requirements. Since its inception on July 1<sup>st</sup>, 2013, our work load has dropped significantly because many potential customers are unwilling to comply with 2013 Title 24. Although the provisions of the 2013 Code do make sense for new construction, they have put such a burden on the remodeling customer that it has become economically unfeasible in many cases and, thus, the goals of reducing energy usage are not being met.

Given that the focus of energy efficiency retrofit projects is the installation of new luminaires or modifications to luminaries resulting in lower power consumption, these proposed modifications will effectively allow energy efficiency providers to once again comprehensively address commercial projects of all sizes.

We urge the CEC to make said modifications retroactive to January 1<sup>st</sup>, 2015.

On behalf of Lumenature and all its employees, thank you for taking the time to consider our input regarding the proposed modifications.

Sincerely,

Pursell Construction Inc.

dba LUMENATURE



Mark Pursell, President

