

From: Mike Gabel [<mailto:Mike@gabelenergy.com>]

Sent: Tuesday, July 07, 2015 4:39 PM

To: 'Eurlyne.Geiszler@energy.ca.gov'; Mazi Shirakh (Maziar.Shirakh@energy.ca.gov)

Cc: Jon McHugh (jon@mchughenergy.com); Gary Farber (farber-energy@sbcglobal.net)

Subject: 2016 Stds 141.0(b)2.I.ii Nonres Lighting Alterations

Hi Eurlyne and Mazi,

I'm not sure who on Staff to send this to, so would you please forward it to the correct person.

With all due respect, 2016 Stds Section 141.0(b)2.I.ii (Nonres Lighting Alterations) is **totally unenforceable**. There is no way to properly document existing lighting fixtures types and wattages in many cases. Furthermore, the existing lighting may happen to be very recently installed and actually be at or below current code. Reduce that wattage by 30%? Makes no sense ..

Please re-write that section to in some way reference the 140.6 allowed watts, or, for example, some percentage (110%?) of the 140.6 allowed wattage if the intent is to be a bit lenient, etc. I don't pretend to know Staff's thinking on the goal of this subsection as compared with simply meeting the normal requirements of 140.6.

Thanks and best regards,

Mike Gabel

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