

Energy - Docket Optical System

From: Leslie Kramer <lfkramer@stanford.edu>
Sent: Friday, August 07, 2015 3:18 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



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

We are commenting again in support of the 15-Day language for the 2016 Energy Efficiency Building Standards. Stanford's group rebalasting program has been stalled for over one year 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 also reduce lighting system wattages that are also on hold due to the complexity and additional cost of meeting the controls requirements. 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.

Stanford also believes it is absolutely vital that the permitting process for lighting retrofits uses a simplified, over-the-counter approach, and that compliance forms and documentation requirements should be highly streamlined and automated. Some opponents have commented that the proposed language is "unenforceable". In reality, enforcement can be very simple. For example, wattages can be adequately documented using a contractor work order or worksheet that gives detailed, space-by-space descriptions of preexisting and newly installed fixture types and wattages; contractors and program implementers routinely supply similar data to utilities for rebate purposes.

In addition, simplified retrofit-specific compliance forms (including electronic versions) should be developed by CEC to further facilitate the compliance process. Ideally, these templates should be capable of accepting bulk text input directly using a common worksheet format as described above. We are confident that this approach is achievable and can be accomplished while the 2016 Compliance Manual and Compliance Forms are being finalized.

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