

Docket # 15-BSTD-01

2016 Building Standards Update

CREDIBILITY & IMPROVED VENUES

August 9, 2015

Greetings

A number of retrofitters, including me, tried to get the CEC to make credible requirements for the 2010 Title 24, but the CEC did what it wanted anyway, which made the 2013 Title 24 a total disaster regarding lighting retrofits. There were too many key dimming and controls people at and connected with the CEC.

Many more main lighting retrofitter contractors, ESCOs, distributors and end-customers have tried to make changes for lighting retrofits in the 2013 and 2016 versions, but the CEC has not been willing or able to really listen to us. There still appears to be people connected with the CEC that are too much connected to the dimming and controls industry. Why is one lighting consultant still employed by the CEC? Plus there is what can be called 'big labor'.

Although the current 15-day language for the 2016 version is a big step in the right direction, it is nowhere close to really get the lighting retrofit industry back to what it was before July 1, 2014. This 15-day language, especially with diminishing returns projects, will kill numerous lighting retrofit projects or make them much smaller.

So I do not have any credibility in the CEC regarding Title 24 for lighting retrofits, and here are some reasons.

1. More energy would be saved with no Title 24 or how most people dealt with the 2010 version.
2. Controls are often not cost effective with commonly available low wattage LED products.
3. With diminishing returns and other factors, any extra cost for Title 24 can kill projects.
4. Most good lighting retrofitters and ESCOs would get to the LPDs they are now without Title 24.
5. In many 'owned' spaces, occupancy sensors can actually increase annual hours of operation.
6. Controls should not be mandated, because if when they are cost effective lighting professionals and end-customers will agree to install them. Rebates are better than mandates.
7. TLED manufacturers must really like the CEC, because that has been the main retrofit with keeping the existing ballast, because that does not trigger Title 24, but it is nowhere the best solution in most applications. The CEC should have been aware of that for the 2013 code, but seemed to focus on grandiose issues, like automatic demand reduction instead.
8. Most lighting retrofitters, ESCOs and others know much more about general cost effective lighting retrofits than anybody at the CEC, including consultants.
9. **The free market is much more suited to decide what is best on each specific lighting retrofit project.**
10. **Since end-customers have the right to keep their existing lighting, they should have the same right to retrofit anyway they want. No organization has the right to take that right away.**

Number 10 can also apply for new construction. Let's say a person wants to build an art gallery building and only wants incandescent or halogen. Why shouldn't that person be able to build that way, as long as he or she is willing to pay the equivalent of 'gas guzzler car tax' and pay the extra to the utility each month? The tax money could be used for energy efficiency research and/or rebates for others.

Even without any government mandates, California and much of the rest of the country and world will become net-zero at least for lighting. This is because lighting products are getting so efficient, PV and wind are becoming much less expensive, and the upcoming generation of residential and commercial

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battery packs. Plus there are natural gas micro-turbines. With plug load over-taking lighting in KWH in many buildings, it does not make sense for the CEC to micro-manage lighting.

I have PV and an electric car and will soon get a smart car charger, which will drain the car battery down to 30% during peak load time when the grid needs it, and then charge it completely after peak load time ends at 9 PM.

As long as the CEC is allowed to make decisions, the CEC can pretty much act as a king handing out crumbs as it sees fit.

A higher and independent group in the State of California would be a big improvement.

Even without that, some of us can spread the word in other open and fair ways.

One venue is the upcoming LightShow West in LA on October 21-22. General attendance is free, but it is \$25 to attend each roundtable.

<http://www.lightshowwest.com/>

There are several seminars and roundtables regarding Title 24, including mine on the 22nd.

Part of my morning sessions will include debating Bernie Kotlier from CALCTP on if controls are often cost effective with today's low wattage LED products and if they should be mandated in Title 24 retrofits. The moderator will be unbiased, or I will not present. I am willing to debate one on one with anybody, but two against one is not fair.

One of my afternoon roundtables is 'Do We Need Big Brother?' which includes the CEC and DLC.

Another venue is San Diego Gas & Electric's Energy Innovation Center, where on October 19, I will present a full day seminar on Human Centric Lighting. With the extra costs often without additional energy savings, this class will include why soft benefits, especially Human Centric Lighting benefits, often have to be included, because the hard savings of reduced electric bills, rebates avoided and maintenance savings are often no longer sufficient to get customer approval. This is a free class, but registration is recommended. It is a shame that the CEC does not allow sufficient wattage for this.

<http://www.sdge.com/eic/seminar>

All are invited to both events.

You can email or call me at 10 AM or later Pacific Time during daylight savings time, which is 7 AM or later here in Hawaii. Thanks for your consideration.

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P.S. I work in across the country, and a number of significant people in various states consider what the CEC has been doing with Title 24 is a bad joke.