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california energy commission
dockets office MS4
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California Energy Commission
DOCKETED
15-BSTD-01
TN # 7612G
AUG 10 2015

Re: Docket No. 15-BSTD-01
2016 Building Efficiency standards

Members of the CEC:

I am writing to let the members of the CEC know that I do not endorse the 15-day language to the 2016 Title-24 standards unless all lighting retrofits are exempt from the insane control requirements and acceptance testing that have been enacted by the CEC.

I say this as a 15 year representative of the lighting retrofit industry. first as a lighting retrofitter. then as a company owner. the only requirement I would agree to is an across the board mandatory 35% energy savings to any retrofit lighting job. by-level switching, task lighting and daylight harvesting should rule the day.

as a company owner and installer i have never installed new fixtures on a large scale. I'm not involved in new construction, incidentally, new construction being the only industry that should really be affected by Title-24. I only install select fixtures on a job that simply **cannot** be retrofit. new fixture installment represents less than 3% of my work. I'm a **retrofitter**. in the years leading up to the disastrous implementation of the 2013 Title-24 standards I estimate I have retrofitted over 80-thousand light fixtures myself, based on 2,740 work days and an average daily production goal of only 30 fixtures. since the disastrous 2013 T-24 standards I estimate I have retrofit **only** 1,000 fixtures, and I'm being liberal.

my colleagues in the lighting industry are accepting your standards because there is no other route. simply put, it stinks, it stinks worse than driving by a waste water treatment plant! we have all tried and tried throughout the years to get the members of the CEC to listen to the experts in the field, the hands on Representatives, only to be regarded as cannon fodder.

your decision making seems to be based on the lobby for the controls industry. and lets not forget big labor trying to protect its wiremen from a diminishing marketplace by falsely representing their share of the retrofit field.

I have complied with California's non-residential light fixture maintenance technician certification. aside from being a feather in my cap, what does this certification mean if I only retrofit an ever diminishing number of light fixtures a year.

I ask the members of the CEC to put aside its 'engineering the world' mentality and adopt a more simple approach to light fixture retrofitting. a vital industry, opposite of new construction, that has saved so much energy in the past decades, despite past decisions by the CEC that have diminished the field of retrofitting to bread crumbs.

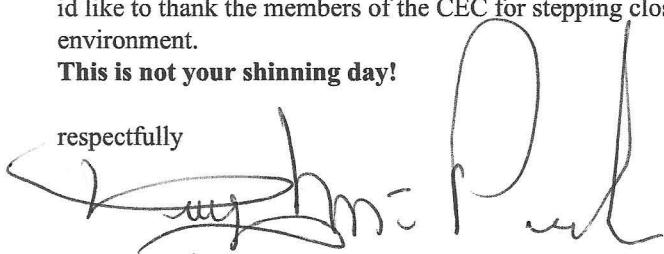
the only smart decision by the CEC on Wednesday august 10th would be to:

- 1) allow exemption of all title 24 standards if a 35% kwh savings is achieved.
 - 2) kick start all of the participating rebate groups with new funding. these groups have been so instrumental in selling and packaging retrofit jobs. ive worked with so many people from rebate groups that have been dedicated to energy conservation. they are vitally important for our industry. I consider us 'one big team'.
- members of the CEC: who's team are you on?

id like to thank the members of the CEC for stepping closer to killing a vital industry that is so important to the planet and our environment.

This is not your shining day!

respectfully



Troy McPeek, Owner