

Docket # 15-BSTD-01

2016 Building Standards Update

STRICTEST vs. BEST

August 12, 2015

Greetings

The CEC cancelled today's meeting today which is totally unprofessional, unless the CEC reimburses people, who were already on their way. So hopefully the CEC will allow this late letter.

Don Link's August 4th letter was excellent. He was one of the first lighting retrofitters I used nearly 25 years ago.

I would like to discuss one of his statements, "The CEC has championed the perfect at the expense of the good, and will most likely realize neither, as the planet continues to warm and the state burns due to climate change".

I hope he would agree that 'strictest' may be a better term than 'perfect'. It makes sense either way.

This is very important because the State of California, CEC and Title 24 can look really good on paper with strict LPW requirements, control mandates, etc., but if it is not realistic or practical, not very much energy will be saved from lighting retrofits.

This Title 24, even with the 15-day language is not realistic or practical enough to really get the lighting industry back on its feet, especially with very little low hanging fruit left and diminishing returns.

For example, there are millions of square feet with troffers, which have 1 32W F32T8 and high performance .89 BF ballast, which only consumes about 28W or 2 25W F32T8s and high performance .71 - .77 BF ballast, which only consumes 38W. Although LEDs will be able to reduce wattage 50 – 60%, the electric bill reduction will be quite small, and any extra costs can kill these projects or force them to go with TLEDs with existing ballasts.

The real retrofit contractors, who are both union and non-union, distributors who supply real retrofit contractors and end-users who want retrofits can provide much more realistic and practical information on cost effective lighting retrofits than the IBEW, regular electrical contractors, controls and dimming manufacturers, controls proponents, etc.

The CEC should be able to follow the money to understand the difference what makes sense improving the lighting retrofit industry and what mainly helps certain companies and organizations.

What I do not understand if the CEC mandates controls when they are not cost effective and contractors have to do the Title 24 paperwork, both union and non-union jobs will be killed.

Please do not misunderstand me, because unions have done a lot of very good things over time. Most of my older relatives were in unions in the Chicago area. For example, my father-in-law worked at Western Electric's Hawthorne Plant, which is where the 'Hawthorne Effect' from lighting came from. But I do not like any organization that does something that benefits them, while causing detriment in the big picture.

Training people on controls is admiral, but mandating controls is not good for the State. When controls are cost effective, they will get installed.

Lastly, Sun Industries, a long-term SoCal lighting retrofit contractor, closed its doors earlier this summer, and one big reason is the existing Title 24.

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. Sorry I misspelled credibility in the title of my last email.