October 16,2015

California Energy Commission
Attn: Docket 15-BSTD-01
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814
Docket@energy.ca.gov

Re: Docket No. 15-BSTD-01 - Adoption of 15 Day Language for the 2016 Building Energy Efficiency Standards - Lighting Alterations

I have just become aware of a retroactive effort to role back many of the approved 2013 T-24 lighting requirements, especially regarding lighting controls. I am writing this email as a California citizen and lighting expert to request your steadfast support to maintain the 2013 T-24 Lighting control requirements and to require validated and substantial data for making any of the proposed reductions to the advance lighting controls in the draft 2016 T-24 language.

Approving any reductions in the T-20 & T24 lighting control requirements would essentially eliminate any possibility of meeting the CPUC Lighting Plan goals of reducing CA lighting energy use by 60% to 80% by 2020.

The significant changes in 2013 T-24 lighting and lighting controls are essential for meeting the CPUC Energy Efficiency Strategic Plan and the AB32 goals.

The statewide California Investor Owned Utilities (IOU) 2015 Lighting Market Transformation report (http://www.lightingmarkettransformation.com/wp-content/uploads/2015/06/2015-Statewide-Lighting-Market-Transformation-Program-Report.pdf)

shows that the potential lighting savings for advanced lighting controls is over 10,000 GWh/year or about 33% of the total Californian IOU lighting savings potential. Current best practices enable additional savings up to over 50% from lighting controls. California cannot meet the CA 2020 goals in the next 4 years if the 2013 T-24 lighting control requirements are not increased in the 2016 cycle as planned by the CPUC Lighting Plan.

I have been working in partnership with the CEC, CPUC, campuses and utilities for over 12 years in developing, demonstrating and market transformation activities for lighting best practices. I worked with Commissioner Art Rosenfeld starting in 2004 in developing the first CEC programmatic lighting research and the development of the market transformation RD&D pipeline concept. The market transformation RD&D Pipeline concept

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integrates the CEC RD&D investments with demonstration programs and utility and industry market transformation activities.

As Art would say in his presentations the RD&D pipeline plan was to help these new technologies "get over the valley –of-death". Many of the initial development and demonstrations of advanced lighting controls were funded by the CEC.

I organized the team that developed the CPUC the Lighting Plan adapted in 2010. The core goal of the plan is continuously improving best practice lighting and controls, demonstrations of them, and using the field data to justify incorporating the improved performance into T20 and T24 changes that lead to CPUC 2020 goals

I have also been working with the CEC SPEED demonstration program for the past 10 years as part of my work at the California Institute for Energy and Environment (CIEE) at UC Berkeley (http://partnershipdemonstrations.org/). The SPEED program included over 80 best practice lighting and controls demonstrations over the 10 years.

The field data and economic analysis from the SPEED, CLTC, CA IOU's, SMUD, DGS, BPA, DOE, NYSERDA, Seattle City Light, BC Hydro and other case studies was used to validate the cost-effectiveness for many of the 2013 T-24 lighting changes.

I have seen no evidence that any of this analysis has been disproven. I do see lot's of evidence from UC Davis, UC Irvine, UC Santa Cruz and many other campuses and businesses of cost effective implementation of the advanced lighting controls that are in the 2013 T24 lighting requirements.

Best Regards,

Karl Johnson

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