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October 22, 2015

Commissioner Robert B. Weisenmiller, Ph.D.
Chair of the California Energy Commission
1516 9th St., MS-29
Sacramento, CA 95814

Re: Support for lighting retrofit exemptions

Dear Chairman Weisenmiller,

The Silicon Valley Leadership Group supports the California Energy Commission's (CEC) proposed language relating to exemptions for lighting retrofits in the Title 24 Building Energy Efficiency Standards. Moreover, the Leadership Group respectfully urges that this discussion be kept on the CEC's agenda for its November 12th meeting.

Specifically, the Leadership Group supports the following proposals:

- Exempt lighting alterations from all area control, multi-level control and daylighting control requirements if the replacement luminaires have at least 35 % lower rated power.
- Exempt lighting modifications project from the power allowance of Section 140.6, as long as it has at least 30 % lower rated power as compared to the original luminaires.
- Increase the number of lighting modifications that can be made without complying with Title 24 requirements from 40 to 70.
- Exempt exterior fixture replacements such that code is not triggered if replacement luminaires have at least 40% lower power consumption compared to the original luminaires.
- Broad exemptions for acceptance testing.

These exemptions are needed to relieve the lighting industry of overly burdensome regulations that have almost doubled the cost of lighting retrofits with little return on energy savings, and which have severely limited the number of lighting retrofit projects in the last few years.

The Silicon Valley Leadership Group Energy Committee works to advocate for policies that return an innovative, competitive, and sustainability-based energy outlook in our market today. As this mission indicates, the Energy Committee has long supported efforts to increase energy efficiency in our state. Exemptions for lighting retrofits would provide clear guidance that would drive and ensure the adoption of energy efficiency to help meet the clean energy goals established by AB 32 and recent clean energy goals like those called for in SB 350.

The Silicon Valley Leadership Group, founded in 1978 by David Packard of Hewlett-Packard, represents more than 390 of Silicon Valley's most respected employers on issues, programs and campaigns that affect the economic health and quality of life in Silicon Valley, including energy, transportation, education, housing, health care, tax policies, economic vitality and the environment. Through its Energy Committee, SVLG advocates for public policies promoting clean energy, energy efficiency, and grid modernization.

Thank you for your leadership on this issue. If you have any questions on our position, please contact Sarah Qureshi, Associate – Energy & Environment, at 408-501-7883 or squireshi@svlg.org.

Sincerely,

Tim McRae
Senior Director of Energy

cc: Commissioners Karen Douglas, David Hochschild, Andrew McAllister, and Janea A. Scott

California Energy Commission

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