

DOCKETED**15-BSTD-01**

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OCT 22 2015**From:** Mark Spahn [<mailto:markspahn@mylightingcompany.com>]**Sent:** Thursday, October 22, 2015 1:16 PM**To:** martha.guzman-aceves@gov.ca.gov; Cross, Catherine@Energy; Awolowo, Ollie@Energy; McDonnell, Kathleen@Energy; Parrow, Donna@Energy; Brousseau, Amie@Energy; Chandler, Tanya@Energy**Cc:** 'Mark Spahn'**Subject:** Docket 15-BSTD-01

URGENT Attention Needed!

Tomorrow afternoon, the CEC will decide if they will bring to a vote the changes to the 2016 Title 24 lighting Modifications and Alterations language that this stakeholder community has been developing for the last year. **If CEC doesn't act tomorrow to put this item on their November 12th agenda, CEC will be unable to make any changes to the current Code until 2020.**

During the Economic Slowdown (Great Recession) of 2007 to 2010, the retrofit Industry took hard hits and approximately 50% of Retrofit Contractors in California went under. Those of us that survived, were able to recover over the next two years and thrive; however with the Implementation of Title 24 2013 on July 1, 2014, the Retrofit Industry came to a Virtual Standstill and roughly half of all remaining Retrofit Contractors that were left lost their businesses over the next year, due solely to the restrictions placed on Retrofit Projects by Title 24 2013.

Personally, my Company ABI Services, Inc. went from 20+ employees/contractors down to 5 employees/contractors over the next 12 months. In the three months prior to the Implementation of Title 24 2013, ABI Services, Inc. had made over \$100,000. Over the first six months (July to December 2014) after Title 24 2013 was Implemented, ABI lost roughly \$120,000. This was a Direct Impact of Title 24 2013. As a result, we let go of a dozen of our staff, closed our hard office and warehouse and now everyone works from Home or in the Field. And in Story after Story I have heard over the past 16 months, the Stories have all been the same and more and more Retrofit Contractors have gone out of business. And not only Lighting Contractors, but Lighting Wholesalers, Distribution, and other Trade Contractors have lost their businesses and homes as well. Essentially, for ABI Services, Inc. and many other Retrofit Contractors (of all types), Retrofit Projects came to a Virtual Standstill for the first three months and it has been an uphill battle ever since, with Retrofit costs virtually Doubling over the pre-Title 24 2013 costs.

It is critically important that CEC hear and vote upon the proposed Code changes because current regulations are so costly and complicated to implement that Code-triggering lighting retrofits in most markets across California have almost entirely stopped. In order for California to meet its GHG reduction goals, and to ensure that businesses once again choose to upgrade lighting equipment rather than maintain existing inefficient systems or even go outside the Permit Process (due to the Excessive Costs), current Code needs to be improved.

The CEC has twice postponed the Vote on the New Language for Title 24 2017 that has been drafted and seemingly accepted by the CEC as a reasonable compromise between Small Business in California and Big Business and Unions. However, if the CEC doesn't vote on it by the meeting tomorrow, then the Current Codes will stay in place until 2020.

Tens of Thousands of jobs are depending on this vote. The changes only apply to Retrofit Projects and does not remove the requirements for Title 24 2013 for New Construction. This is a Good Sense

Change. Otherwise, not only will California lose Tens of Thousands of Middle Class Jobs, but likely 3/4 of the potential Energy Savings (in the Terawatt range) that could be realized over the next 3-5 Years if the agreed upon language is changed.

California Needs this Vote.

I encourage all to do their Very Best effort to get this vote on the CEC Agenda for tomorrow, October 23rd and get this Change in Language passed. It is Critical for the Health and Long Term Recovery of California.

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