



October 22, 2015

CALIFORNIA ENERGY COMMISSION

Attention: Docket No. 15-BSTD-01

Dockets Office

1516 Ninth Street, MS-4

Sacramento, CA 95814

I am writing to share with you my experience earlier this summer with obtaining an electrical permit under Title 24 from the City of Palo Alto for a lighting retrofit project. I hope this will further convince you of the need for an exemption for lighting retrofits under Title 24, and the need to bring the 15 day language to a vote in the November meeting so code can be changed for 2016.

Lighting retrofit contractors are doing and have been doing a great job of saving energy in California. We are continually at the forefront of new technology, and work to do comprehensive energy savings projects wherever it is economically feasible in existing buildings. We are being hampered and in many cases hamstrung by the paperwork and controls requirements of Title 24 2013. The following is an example.

Day 1: We prepared the Title 24 paperwork and necessary forms for obtaining an electrical permit and visited the permits office. The inspector at the desk said that everything looked good, but he was worried about the UL classifications of the retrofit kits with respect to the existing fixtures.

The inspector said, **“I don’t need to look at the energy paperwork. Of course it’s energy efficient. It’s LED.”** He was right. The allowed lighting power for the building and the parking lot was 115,314 watts, and we are using 38,779 watts.

Day 2: We arrived at the permits office with the UL classification information, and spoke to a different inspector, and he told us that we couldn’t use the unit pricing for the permit which would have cost us \$922, but instead would have to use the per square foot pricing which would cost \$10,118. He also requested a layout of the exterior pole lights on which we are planning to replace the heads.

Day 3: We returned with the pole light layout, and were told to meet with the planning person who told us we would have to go before the Architectural Review Board next month to make sure the change in the parking lot lights was acceptable. We were able to talk him



out of that. Instead, we were able to provide a drawing of the existing and proposed heads to scale with measurements.

We then met with the plan checker, who told us that we would have to make any ADA upgrades that are necessary **for the whole building** because the project is over \$150,000. He also wanted a reflected ceiling plan which we didn't have because this is an older building. We were able to talk them out of both of those requests.

Day 4: We returned with the scale drawings of the proposed parking lot light fixtures, and the planning person told us he was worried about light trespass onto adjoining properties, and he wanted a photometric evaluation of the parking lots. Luckily, the parking lots were well contained within the property, and we were able to convince him that there would be no light trespass.

We got the permit, and only had to pay \$922 for it.

While this is a rougher permit process than many, it isn't unusual. We spent a large part of four days procuring the permit for a \$200,000 job. We haven't gone through the inspection phase of the process yet. If the job were smaller, the cost of obtaining the permit could be more than the cost of the job.

Obtaining permits is part of building a structure or doing a tenant improvement, and the cost is expected. For a lighting retrofit project, the cost of obtaining a permit alone can push the costs outside the acceptable payback, and in the end, we are designing projects that far exceed title 24 energy savings in any case.

Thank you in advance for pushing to vote on the 15 day language at the November meeting. If it is not voted for at the November meeting, I fear that California will miss out on valuable energy savings that could be gained by the energy efficient lighting community that is in danger of extinction at present.

Sincerely,

A handwritten signature in black ink that appears to read "Matt".

Matt Tracy
President
Enlight