

California Energy Commission
Attn: Andrew McAllister

October 22, 2015

California Energy Commission

DOCKETED

15-BSTD-01

TN # 76261

OCT 23 2015

Dear Commissioner McAllister,

Hundreds of skilled jobs in the lighting retrofit industry are being lost and California's ability to meet its energy efficiency and greenhouse gas reduction goals is being compromised by the unintended consequences of a critical section of Title 24 2013. California Energy Commission staff has been working with the stakeholder community for the last year to develop language that will correct the oversights in the current Code. In June CEC staff presented the proposed 2016 Title 24 Code to Commissioners, who approved all chapters except Sections 141.0(b)2.I., J., K., and L., and Tables 141.0-E and -F, which is all the language dealing with lighting system Alterations and Modifications. Approval on this language was delayed to address concerns about the quantity of energy savings that would result from the proposed changes. CEC staff have since confirmed that the proposed 2016 15 Day Language for these sections will indeed generate greater energy savings, and the item was placed on the agenda for CEC meetings on August 12 and again October 14. However, both times this topic was pulled from the agenda without explanation.

If the CEC does not make a decision on this issue during their Thursday November 12 business meeting, the current flawed 2013 language will remain in force until 2020, effectively blocking a large group of utility ratepayers from upgrading their lighting systems and greatly damaging an already reeling lighting retrofit industry. The proposed Code language represents a hard-won compromise between conflicting interests that will deliver significantly greater energy savings than the current Code. **We urge you to direct the CEC Commissioners to hear and approve the proposed Code during their November meeting.**

The energy savings and industry impacts described above are supported by docketed evidence provided to CEC by dozens of stakeholders that document the unintended consequences of the 2013 Code. Stanford University is one of those stakeholders. Our group re-ballasting program, which has been the university's primary mechanism for widespread adoption of more energy efficient lighting, did not proceed with projects last year that would have saved roughly 400,000 kWh annually due to the added cost to comply with the current "Alterations and Modifications" section of the 2013 code and uncertainty about its future.

Respectfully,



Gerry Hamilton, PE
Director, Facilities Energy Management