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Subject: Docket 15-BSTD-01

Your Honorable Governor Brown, CEC Lead Commissioner McAllister, CEC Chairman Weisenmiller, et al.

2016 Title 24 lighting Modifications and Alterations language

It is critically important that you 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, current Code needs to be improved.

WHAT THIS MEANS is that current Title 24 code has paved the way for short term, non-standard retrofit offerings, and eliminated established and verified engineered products from entering into the design and retrofit of existing lighting technologies. Making California a host to parasitic manufacturers, who offer cheap solutions that will lead to owner's expense in the short term future, while making more viable, long-term solutions that perform correctly, financially out of reach due to code triggering requirements on these solutions.

It would be my pleasure to discuss examples of how the current language has reversed good judgement in how we approach electrical lighting upgrades.

We need to your action now.

Thank you

Troy E. Vaughn

Troy Vaughn, Business Development Mgr

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