



## California Retrofit, Inc.

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California Energy Commission

**DOCKETED**

**15-BSTD-01**

**TN # 76314**

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November 2<sup>nd</sup>, 2015

California Energy commission

1516 9<sup>th</sup> street

Sacramento, Ca. 95814-5512

Re: Docket 15-BSTD-01-Title 24


To: whom it may concern:

California Retrofit, Inc. is a California licensed Electrical contractor primarily engaged in the business of lighting retrofits in schools, commercial buildings, warehouses, universities and related building s in California. We have been in business for 29 years. We normally employ 15 full time licensed nonresidential lighting technicians who work full time on retrofit work. Due to the advent of title 24, we have fired all of these crew members, as well as 2 project managers. We have not been able to sell a single project of any size due to the extremely high cost of complying with title 24. Although we think title 24 is a good measure for new construction, it is killing the lighting retrofit business in California. Two of our larger competitors have closed their doors this year due to lack of retrofit business.

Business owners are not interested in funding retrofits as expensive as projects complying with Title 24 would be. They either opt for not doing projects at all, or restrict those projects to fixtures which do not have to qualify with title 24. The typical non-compliant title 24 project would cost approximately \$1.50 per square foot, the cost of a project complying with title 24 is in excess of \$3.00 per square foot, or double the cost, which extends the return on investment period to unacceptable levels.

We strongly suggest that you keep title 24 for new construction, and relieve the lighting retrofit industry from compliance with it.

Sincerely,



Richard N. Mitten, CFO.