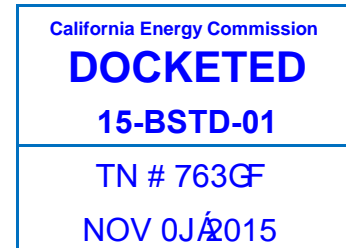




November 9, 2015

Submitted via email: docket@energy.ca.gov

Mr. Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, California 95814



Philips Lighting Comments on the Proposed Revisions to the California Building Energy Efficiency Standards California Code of Regulations, Title 24, Part 6; 15-Day Language – Revised 2016 Lighting Alterations Provisions

Dear Commissioner McAllister,

Philips Lighting appreciates the opportunity to provide the attached comments on the Proposed 15-Day Language issued October 27, 2015 for Section 141.0(b)2, Nonresidential Lighting Alterations Provisions.

As a diversified technology, health, and well-being company focused on improving people's lives, innovation has long been a cornerstone of our company strategy and over the last 120 years has created a strong and trusted Philips brand with market access all over the world. Philips is always looking to tomorrow to understand how light will improve and influence our lives in the future, and how we can continue to reduce our energy consumption and carbon footprint.

Our history in North America began in 1933, and today, North America is our largest single market in the world, with approximately 22,000 employees and operations at 55 major facilities in 25 states and across 3 Canadian provinces. Sales for the region in 2013 were more than \$9.5 billion accounting for more than 30% of Philips global revenue.

Lighting systems from Philips beautify spaces and transform environments. As leaders in the LED technology revolution and the evolution of lighting solutions, we create lighting systems that prioritize energy efficiency, sustainability, and operational cost reduction. We focus on improving the livability and effectiveness of indoor and outdoor environments, providing everything from functional general illumination to spectacular color-changing experiences that reduce energy consumption, enhance brand, encourage social interactions, and revitalize communities.

If you have any questions on these comments, please contact my colleague, Kelly Seeger at +1 (617) 250-0330 or Kelly.seeger@philips.com.

Sincerely,

Dr. David Woodward
Standards and Regulations Manager Americas
Philips Lighting
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Comments on the Proposed Revisions to the California Building Energy Efficiency Standards California Code of Regulations, Title 24, Part 6; 15-Day Language – Revised 2016 Lighting Alterations Provisions

Philips fully supports the 15-day language for Section 141.0(b)2 and echoes the sentiments of our customers and many others in the lighting retrofit industry in California in urging the CEC to approve and adopt the October 27, 2015 15-day language for Title 24, Part 6, Section 141.0(b)2, Nonresidential Lighting Alterations Provisions at its hearing on November 12, 2015. The proposed 2016 language is indeed an improvement over the language in Title 24 2013 and will encourage lighting system retrofits and deliver greater energy savings than the current 2013 code. We believe the CEC's adoption of this language to be critical to reinvigorate the retrofit industry in CA.

Philips applauds the continuing efforts of the CEC and its staff to work with industry and we recognize the following positive contributions toward developing a mutually beneficial 2016 code:

- The revised format of Section 141.0 into three sub-sections: entire luminaire alterations (I.), luminaire component modifications (J.), and lighting wiring modifications (K.) simplifies interpretation and compliance with the code for all parties.
- The removal of all language relating to the confusing alteration sub-type 'Luminaire modification in place' including the associated Table 141.0-F results in a significant improvement in clarity and simplification of the code.
- Requiring a 35% lower power rating for all replacement luminaires in office, retail, and hotel occupancies, and 50% lower power rating for all replacement luminaires in all other applications is appropriate and will enhance the energy savings potential of lighting retrofits.
- The proposed Table 141.0-E now clearly indicates that the control requirements of Section 141.0 only apply to Entire Luminaire Alterations (I). We also appreciate that the proposed language in the table provides direct answers to the reader instead of merely providing the referenced section name.
- We believe the proposed 15-day language presents a concise process for compliance for one-for-one luminaire retrofits as well as lighting alterations with new layouts. Modifying 10% or more of the existing luminaires in a space triggers compliance. If the resulting lighting power is less than or equal to 85% of the lighting power allowance then area controls, multi-level lighting controls, and automatic shut-off must be installed. If the resulting lighting power is greater than 85% of the lighting power allowance, then automatic daylighting controls and demand responsive controls (if applicable) must be installed in addition to area controls, multi-level lighting controls, and automatic shut-off controls.

Thank you for your consideration of Philips comments on the Proposed Revisions to the California Building Energy Efficiency Standards California Code of Regulations, Title 24, Part 6; 15-Day Language – Revised 2016 Lighting Alterations Provisions.