

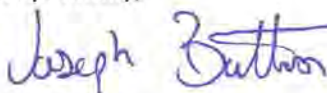
RE: Adoption of the 15-Day version of the proposed Title 24 2016 Lighting Alterations and Modifications language

The Association of Monterey Bay Area Governments' (AMBAG) Energy Watch program implements energy efficiency programs in the tri-county Monterey Bay region. AMBAG Energy Watch, a Local Government Partnership program, has provided energy efficiency programs and services to this region since 2006. During that time, AMBAG Energy Watch has achieved over 80 million kilowatt hours in electric energy savings and delivered over \$12 million in incentives to influence the uptake of energy efficiency projects, including lighting retrofits. ***This purpose of this letter is to encourage the CEC Commissioners to approve and adopt the new 15-Day version of the proposed Title 24 2016 Lighting Alterations and Modifications language (Sections 141.0(b)2.I., J., K., and L., and Tables 141.0-E and -F) at the November 12, 2015 business meeting.***

The consequences of not adopting this language are dire for the lighting retrofit industry. It would essentially block a large group of utility ratepayers from upgrading their lighting systems and greatly damage an already reeling lighting retrofit industry. The 2013 update to Title 24 took effect last July and put in place significantly increased standards for lighting retrofits, essentially treating them much more like new construction. However, while many of the new requirements make sense for new construction and major renovations, they are neither appropriate nor affordable when applied to retrofit situations. These new requirements have greatly increased job costs and complexity for lighting retrofits but delivered little if any corresponding increases in energy savings. Instead of producing greater energy savings from lighting retrofits, these sections of Title 24 2013 are steering building managers to simply maintain their existing inefficient but functional lighting systems rather than upgrading their equipment. This strands potential energy savings and hinders California's ability to hit its energy efficiency and GHG reduction targets.

The proposed 2016 15-Day lighting system Alterations and Modifications language is a consensus document that incorporates a great deal of stakeholder involvement and compromise. The proposed language is broadly acceptable to the lighting retrofit industry because it reflects market realities and provides much-needed relief by correcting the most critical deficiencies in the current Code that have been blocking thousands of projects and stranding savings. CEC's thorough engineering analysis and calculations demonstrates that the proposed Alterations language will deliver substantially more real-world savings than 2013 Code. For all these reasons, it is essential that the Commission adopt the proposed 2016 15-Day Language at its upcoming November 12 business meeting.

Respectfully,



Joseph Button
Assistant Special Projects Manager
Association of Monterey Bay Area Governments
831.883.3750
jbutton@ambag.org

