



November 10, 2015

TO: California Energy Commission
1516 Ninth Street Sacramento, CA 95814
Submitted via email to: docket@energy.ca.gov

FR: California Business Properties Association
Building Owners and Managers Association of California
California Building Industry Association
Commercial Real Estate Development Association
International Council of Shopping Centers

RE: ***Docket No. 15-BSTD-01; 15-Day Language for the 2016 Building Energy Efficiency Standards Lighting Retrofit Code Improvements***

California Energy Commission

DOCKETED

15-BSTD-01

TN # 76331

NOV 10 2015

The above referenced groups are pleased to support the proposed improvements to lighting retrofits section of Title 24 as put forward in Docket Number 15-BSTD-01.

As California's energy code has lead the way in the nation making sure that our buildings are the most efficient in the country, from time-to-time regulations may not work out in the real world as they do on paper. Even with thorough analysis and an inclusive stakeholder process, the lighting retrofit requirements in question have turned out to be more complicated and burdensome to implement than expected when the Commission adopted the package.

Our members are reporting that costs of tenant improvements for these requirements are anywhere from double to five times the initial estimates. Our members have reported that some planned improvements are not moving forward due to these cost increases. We understand that this is only anecdotal information, but hope that you will factor in this information "from the field," as you go about deliberations.

We believe that the new regulatory language will still achieve the same, if not greater, energy savings by providing an alternative path to compliance, which will bring down the cost and complication of compliance in some instances and assure that fewer tenant improvements are stalled due to a cost effectiveness concerns.

We thank you for your attention to this matter. Please feel free to contact Matthew Hargrove (CBPA, 916-443-4676) if you have any questions or comments about or support for this measure.

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