

License# 904259

2491 Alluvial Ave Ste 480, Clovis, CA 93611 Tel: 559-324-8280 \* Fax: 559-402-1368

California Energy Commission Attn: Docket 15-BSTD-01 Dockets Office 1516 Ninth Street, MS-4 Sacramento, CA 95814 Docket@energy.ca.gov

Re: 2016 Building Standards Update; 15-BSTD-01

November 10, 2015

**California Energy Commission** 

**DOCKETED** 

15-BSTD-01

TN # 7633J

NOV 10 2015

To Whom It May Concern:

Current Title-24 2013 code has had a devastating effect on the lighting retrofit arm of Advanced Energy Services, Inc. (AES). We went from 12 full time installers down to 2 part time installers as a direct result of the 2013 code. That is not forecasted to change anytime in the near future unless the current advanced lighting controls requirements are reversed. Of our active projects, they are significantly smaller in size and less comprehensive than what we were doing prior to 2013 code. Our revenue is down 60% from 1st and 2nd Quarters 2014

Many opponents of the proposed 15-Day Language seem to believe that the 2013 Code is successful. As a Certified Advanced Lighting Controls Acceptance Testing Employer, we have worked directly with many companies that have not seen the 2013 Code impact their business. In digging deeper, it has been discovered that the 2013 Code is not impacting their business because it is not being enforced in many jurisdictions. Every time the 2013 Code is enforced, it wreaks havoc on their processes and job costs.

Respectfully,

Advanced Energy Services, Inc.

Nathan Schetselaar Operations Manager Tel: 559-324-8280

Fax: 559-402-1368

nathan@advancedenergysvcs.com