

November 10, 2015

Submitted via email: docket@energy.ca.gov

Mr. Andrew McAllister Commissioner California Energy Commission 1516 Ninth Street Sacramento, California 95814 California Energy Commission DOCKETED 15-BSTD-01 TN # 763I € NOV 10 2015

Re: Docket No. 15-BSTD-01

Lutron Electronics Co., Inc. Comments on the 15-Day Language for Section 141.0(b)2, Nonresidential Lighting Alterations Provisions for the 2016 Energy Efficiency Standards

Dear Commissioner McAllister,

Thank you for the opportunity to review and provide comments on the second 15-Day Language for Section 141.0(b)2, Nonresidential Lighting Alterations Provisions. These comments are submitted on behalf of Lutron Electronics Co., Inc.

As you may know, Lutron was founded in 1961 and is headquartered in Coopersburg, Pennsylvania. From dimmers for the home, to lighting management systems for entire buildings, the company offers more than 17,000 energy-saving products, sold in more than 100 countries around the world. In the U.S. alone, Lutron products save an estimated 10 billion kWh of electricity, or approximately \$1 billion in utility costs per year. The company's early inventions— including the first solid-state dimmer invented by Lutron's founder, Joel Spira—are now at the Smithsonian's National Museum of American History in Washington, DC.

Please find our detailed comments below. We look forward to working with you further on this important project. Please contact Michael Jouaneh at 610-282-5350 or <u>mjouaneh@lutron.com</u> if you have questions or would like more information on these comments. Thanks again for your consideration.

Respectfully submitted,

Michael Jouaneh Manager – Sustainability and Energy Standards Lutron Electronics Co., Inc.



The comments and suggested edits to the proposal are shown below:

1. **141.0(b)2lii. Entire Luminaire Alterations.** The 50% power reduction is a step in the right direction. However, the CEC should address how this power reduction will be enforced. Once the old fixtures are removed an inspector can't verify the previous lighting load. They can, however, verify the new lighting load and they know what the LPD allowances are per the Standard. This is why we believe the power reduction should be based on new LPD compared to the maximum allowed LPD for the space per the Standard.

Furthermore, Exception 2 that exempts enclosed spaces with two or fewer fixtures eliminates any requirements from most private office spaces. This should be changed to exempting space with one fixture so that a renovation of an office building doesn't exclude requirements from private offices.

- 2. **141.0(b)2J. Luminaire Component Modifications.** The 70 luminaire threshold is too large and represents more backsliding in the 2016 Standard. Many projects will alter less than 70 luminaires and therefore be exempt from any requirements. We urge the Commission to maintain the 40 luminaire threshold that has already been in vetted in the 2013 Standard.
- 3. **141.0(b)2K. Lighting Wiring Alterations.** The 10 or more luminaire per space threshold before automatic daylight control requirements shall be met is too high. In one room, there are many rooms that have 10 or less luminaires in a primary daylight zone near windows or skylights that can benefit from automatic daylight controls. This exception should be based on wattage of lighting power in a daylight zone rather than a number of luminaries. A project can have one very large pendant luminaire in a daylight zone that uses 300W of lighting power yet not be required to have automatic daylight controls. While a project with 11 luminaires using 200W of power would be required to use automatic daylight controls. If wattage can't be used, then make the requirement by floor not space.