

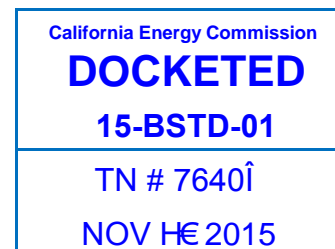
Docket # 15-BSTD-01

2016 Building Standards Update, and hopefully also 2013 improvement

CEC Is Hastening Illumigeddon and Hurting California Businesses

November 25, 2015

Greetings



Unless the California Energy Commission (CEC) does something much better than the existing 15-day language, it will hasten Illumigeddon and further hurt California lighting and end-customer people and businesses.

Chris Brown, CEO of Wieden-Brown has been developing Illumigeddon for quite a while. The November 15 issue of the Electrical Distributor Magazine has an interview with him.

http://www.tedmagazine-digital.com/tedmagazine/november_2015?pg=24#pg24

There are several other pieces regarding Illumigeddon on the web and other places.

Unless the CEC does something substantially better than the Title 24 15-day language, the CEC will hasten Illumigeddon, which will reduce energy savings, profitability and jobs for lighting retrofits. If anybody thinks that anybody at the CEC, including Jim Benya, has a real understanding of cost effective lighting retrofits, please let me know. The CEC needs to evolve and throw away the old strategies, including three year Title 24s. For example, who can accurately forecast 2019 or 2020 lighting and controls at this time?

This affects California tax paying retrofitters, ESCOs, distributors, lighting reps, lighting designers, end-customers and others.

There are other factors, not directly included in that magazine article.

Two LED product manufacturers have bypassed California rep agents, distributors, and even contractors, selling canopy lighting fixtures over gasoline pumps directly to gas station companies.

At least one LED product manufacturer is bringing the European vertical market to the United States, including California. This is one-stop shopping, where the manufacturer takes care of audits, specification, products, installation, commissioning and rebate paperwork, often bypassing California lighting businesses.

At least one other LED product manufacturer is telling its good-sized end-customers that the end-customers should continue pay what they do for electricity, but pay the manufacturer instead. The LED manufacturer will do a lighting retrofit and handle maintenance at no extra cost and pay the utility the lower electric bills to the utility. This could bypass California lighting businesses.

If the CEC does not do something better than 15-day language, that will hurt all lighting retrofit projects, but probably California lighting businesses the most, because without being able to deliver decent paybacks and other financial returns, end-customers may be more prone to go with some of the LED product manufacturers' comprehensive programs. The end-customers may decide to do nothing, because no options are cost effective. The manufacturer comprehensive programs are probably only for large projects, and if most local lighting companies do not get sufficient large projects, they probably cannot make sufficient money from only small projects.

Everybody can watch my free one-hour controls webinar for Seventhwave, which used to be Energy Center of Wisconsin. For example, often occupancy sensors are not cost effective with four or more lighting fixtures in a room, while the Title 24 15-day language only allows up to two lighting fixtures in a room without an occupancy sensor.

<https://www.seventhwave.org/education/webinars/advanced-lighting-controls-barriers-benefits-and-beyond>

With any mandates and extra costs from Title 24 and also diminishing returns and IBEW cancelling light fixture maintenance classification, the amount and size of lighting retrofits will be significantly reduced with nothing better than just the 15-day language.

Unless the CEC will make lighting retrofits easier, I will continue recommending that most California lighting professionals should get out of lighting retrofits or at least start to focus on providing other services.

Currently the CEC is motivating me to retire the end of 2016.

What keeps coming up to me is since end-customers can keep their existing lighting, why shouldn't they have the right to retrofit their lighting any way they want to, as long as it is safe?

I will try to get at least one national trade magazine to print the message of this letter.

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