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California Energy Commission  
**STAFF REPORT**

# **Staff Analysis of 2016 Nonresidential Lighting Alterations Alternatives for Demonstrating Compliance With the Existing 2013 Standards**

**California Energy Commission**  
Edmund G. Brown Jr., Governor



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# California Energy Commission

Maziar Shirakh, P.E.  
Gabriel D. Taylor, P.E.  
**Primary Authors**

Peter Strait  
**Project Manager**

Christopher Meyer  
**Office Manager**  
**BUILDING STANDARDS OFFICE**

Dave Ashuckian, P.E.  
**Deputy Director**  
**EFFICIENCY DIVISION**

Robert P. Oglesby  
**Executive Director**

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## ABSTRACT

On November 12, 2015, the California Energy Commission adopted the 2016 revision to California Code of Regulations, Title 24, Part 6, Building Energy Efficiency Standards, Section 141.0, relating to nonresidential lighting alterations. Energy Commission staff has determined that the newly adopted language provides a percentage reduction compliance pathway that saves as much or more energy than the 2013 language in effect. For this reason, Energy Commission staff recommends that a percentage reduction pathway based on the 2016 requirements for nonresidential lighting alterations go into effect as an optional compliance pathway before the January 1, 2017, effective date of the *2016 Building Energy Efficiency Standards*.

**Keywords:** Title 24, Lighting Alterations, Additional Compliance Path

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## Executive Summary

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Public Resources Code Sections 25402 and 25402.1 were enacted in 1975 as part of the enabling legislation establishing the California Energy Commission and its basic mandates. These sections require the Energy Commission to adopt, implement, and periodically update energy efficiency standards for both residential and nonresidential buildings.

On June 10, 2015, the Energy Commission adopted the *2016 Building Energy Efficiency Standards*, Title 24, Part 6; however, the Commission delayed adopting changes to Section 141.0 for alterations to existing lighting systems in nonresidential buildings to provide adequate opportunity to address public concerns. These changes were made in response to stakeholders' concerns with the 2013 language:

- The language was too complex, which made it difficult to determine compliance.
- Running new wiring for multilevel and bilevel controls made some otherwise cost-effective projects no longer possible.
- It was expensive to accurately determine lighting power densities and difficult to do so for nonrectangular spaces.

The Energy Commission received more than 300 written comments on the Section 141.0 changes. After reviewing and responding to these comments, working extensively with stakeholders, and making a series of refinements to the standards language, the Commission developed Section 141.0 language that:

- Retains area, automatic shutoff, and occupancy sensor controls for lighting alterations projects.
- Adds an additional compliance path for projects that reduce existing lighting power by 50 percent in hotel, office, and retail occupancies, and by 35 percent in all other occupancies that do not require multilevel controls.
- For wiring alterations, establishes an exception for daylighting controls for wiring alterations of 10 luminaires or fewer in an area.

On November 12, 2015, the Energy Commission adopted the 2016 revision to Section 141.0. The 2016 Section 141.0 language provides a compliance pathway that saves as much as or more energy than the 2013 language at a lower cost. For this reason, commenters requested that the Energy Commission consider allowing "early compliance" with the 2016 Standards as an additional compliance path for the 2013 Standards. Commission staff analyzed this request and recommends that an optional percentage reduction compliance path based on the compliance path added to the 2016 Standards be approved for 2013, consistent with Public Resources Code Section 25402.1(b); Title 24, Part 1, Section 10-109. Staff requested and received public comments on this proposal, which are reflected in this analysis.



# CHAPTER 1:

## Purpose

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Public Resources Code Section 25402.1(b) authorizes and directs the California Energy Commission to approve additional compliance paths for new products, materials, and calculations to demonstrate compliance with the *Building Energy Efficiency Standards*. Title 24, Part 1, Section 10-109 authorizes the Commission to approve alternative paths to compliance. Section 10-109(d) requires that an alternative compliance path achieve the energy savings expected by the standards, and Section 10-109(h) authorizes alternative procedures or protocols to demonstrate compliance with the existing requirements of Part 6. Once approved by the Commission, an additional compliance path may be used immediately to meet existing requirements, providing the public with an additional way to comply with the standards.

For an additional compliance path to be approved, it must:

1. Provide an additional compliance path to the existing requirements, without deleting or amending any part of the existing requirements.
2. Not result in increased energy consumption, compared to the existing requirements, for affected buildings.
3. Follow the public review and Commission approval requirements of Section 10-110, including a 60-day comment period, before Commission approval.

### **2016 Lighting Alterations Updates**

On November 12, 2015, the Energy Commission adopted updates to Title 24, Part 6, sections relating to nonresidential lighting alterations (Sections 141.0(b)2I, J, K, and L). These updates included the addition of an alternate compliance pathway to Sections 141.0(b)2I and J that allows projects to comply based on achieving a specified percentage reduction in installed lighting power and meeting modified requirements for lighting controls. Staff found this alternate path saves as much or more energy as the 2013 requirements for nonresidential lighting alteration projects and to be less burdensome.

### **Proposed Additional Compliance Path**

Staff proposes that the Energy Commission approve an additional compliance approach for showing compliance with the 2013 Standards, based on the *2016 Standards for Nonresidential Lighting Alterations*. This analysis demonstrates that the lighting alterations language in the 2016 Standards Sections 141.0(b)2Iii and 141.0(b)2Jii, in conjunction with Section 130.1 in the 2013 Standards, is equivalent to or more stringent than that of Section 141.0(b)2I of the 2013 Standards. Therefore, it should be allowed as a compliance option for the 2013 Standards.

The full text of Sections 141.0(b)2I and J are contained in Appendix A. In summary, the relevant sections of each accomplish the following:

- Section 141.0(b)2Iii applies to lighting projects where luminaires are entirely replaced, where new luminaires are added to a space, or where walls or ceilings are added or modified. These projects are given the option of meeting a modified set of control requirements as long as they meet a high standard of overall lighting power reduction compared to the original luminaires. That reduction is at least 50 percent lower rated power at full light output for hotel, office, and retail occupancies, and at least 35 percent lower in all other occupancies.
- Section 141.0(b)2Jii applies to lighting projects where only internal components of luminaires are modified, as opposed to the entire luminaire being replaced. These projects are given the same option of meeting modified control requirements as long as they meet the same high standards of overall lighting power reductions as required by Section 141(b)2I.

Therefore, staff proposes an optional compliance path that allows projects to demonstrate compliance with the 2013 Standards by 1) achieving a 50 percent reduction in installed lighting power in hotel, office, and retail occupancies, or a 35 percent reduction in all other occupancies; and 2) installing the controls required by Section 141.0(b)2I, save for the two-level lighting controls specified in Tables 141.0-E and F.

The proposed option would allow the lighting power allowance of the alteration project to be determined using a percentage reduction approach in place of the current calculation using the square footage of each area. The form developed for compliance with the 2016 Standards, NRCC-LTI-06, can be used for this as it documents all the information required for this option. The option would also allow projects complying with the lighting power allowance that results from the percentage reduction calculation to forego installation of the bilevel lighting controls prescriptively required under the equivalent 85 percent of the square-footage lighting power allowance. This is based on staff's finding that such projects, if modeled consistent with the performance compliance approach, would meet or exceed the energy budget of the standard design building and would, therefore, comply with the requirements of the 2013 Standards.

The lighting control requirements of Section 130.1 are mandatory for newly constructed buildings. For alterations, Section 141.0(b) specifies that these requirements are prescriptive, meaning the performance compliance approach can be used instead of the prescriptive approach to demonstrate compliance based on calculating an energy budget for the alteration rather than on inclusion of specific prescribed measures. Staff previously found (as part of developing the 2016 Standards) that achieving a 50 percent lighting power reduction in hotel, office, and retail occupancies, and a 35 percent reduction in all other occupancies, results in as much or more energy savings than installing 85 percent of a square-footage-based lighting power allowance and installing bilevel controls. Based on this prior finding, staff now finds that achieving the

percentage reduction targets and foregoing bilevel controls is allowable in the 2013 Standards under the performance compliance approach. Specifically, staff finds that following the percentage reduction approach results in a building meeting the same requirements and achieving the same energy savings as a building using the performance compliance approach to demonstrate compliance with the 2013 Standards.

From this finding, staff proposes this option as an alternative procedure that demonstrates compliance with the standards. The proposed compliance option is an alternative to modeling the building performance based on the reasonable expectation that the energy budget of a building achieving a 50 or 35 percent reduction in lighting power will, if modeled, meet or exceed the efficiency of the standard design building without needing to install bilevel lighting controls. This compliance option provides relief for projects where installation of new wiring would be onerous or uneconomical compared to the energy savings expected from the availability of a middle lighting level and where modeling the performance of the building to demonstrate that the controls are not necessary for achieving a compliant energy budget is also cost-prohibitive.

While this option is conceptually drawn from the language adopted in the 2016 Standards and includes the same percentage reduction specifications, it is not a proposal to consider the 2016 language as effective before its effective date. The 2016 language (included for reference in Appendix A) incorporates extensive edits to clarify and rephrase requirements, and incorporates new measures and exceptions that are not present in the 2013 Standards and that are beyond the scope of this compliance option. The 2016 language is not proposed to be incorporated, approved, or in any sense made effective prior to the normal effective date. This compliance option proposes solely to allow projects the option of demonstrating compliance using the NRCC-LTI-06 procedure developed for the 2016 Standards, and to allow such projects to proceed without incorporating bilevel lighting consistent with the findings of equivalency made during the 2016 rulemaking proceeding and the performance compliance approach allowed by the 2013 Standards.

## **New Compliance Path Compared to Existing Options**

The 2013 Standards allow tradeoffs between power, measured as lighting power density, and time, through the use of automated controls, while maintaining or reducing energy. Two options for compliance were provided in 2013:

- Option 1: Higher lighting power allowance and additional controls
- Option 2: Lower lighting power allowance and fewer controls

The 2016 Standards added a third option for compliance: reduction of luminaire lighting power by at least 50 percent in hotel, office, and retail occupancies or 35 percent in all other occupancies.

**Table 1** compares the 2016 Standards alternative compliance path for luminaire alterations to the existing 2013 Standards paths. The existing compliance paths are

represented as “Option 1” and “Option 2,” and the new compliance path is represented as “New Option.” The New Option provides an additional path for complying with the 2013 Standards when existing lighting power is reduced by 50 percent for hotel, office, and retail occupancies, or 35 percent for all other occupancies, while Option 1 and Option 2 remain available as prescriptive compliance paths.

**Table 1** also summarizes Section 130.1 controls requirements and compares which controls requirements would apply for each of the three options. “Yes” indicates that the specified Section 130.1 controls requirement applies. “Not required” indicates that the specified controls requirement does not apply.

**Table 1: Control Requirements for Luminaire Alterations**

Applicable Section 130.1 control requirements:	Resulting lighting power, compared to the lighting power allowance in Section 140.6(c)2, Area Category Method		
	EXISTING OPTION 1 Lighting power density is > 85% of allowance	EXISTING OPTION 2 Lighting power density is ≤ 85% of allowance	NEW OPTION Existing lighting power is reduced by 50/35%
<b>Section 130.1(a)1, 2, and 3</b> Area Controls	Yes	Yes	Yes
<b>Section 130.1(b)</b> Multi-Level Lighting Controls - only for alterations to general lighting of enclosed spaces 100 square feet or larger with a connected lighting load that exceeds 0.5 watts per square foot	Yes	Bilevel Switching – for each enclosed space, minimum one step between 30-70 percent of lighting power regardless of luminaire type, or meet Section 130.1(b)	Not Required
<b>Section 130.1(c)</b> Shut-Off Controls	Yes	Yes	Yes <sup>1</sup>
<b>Section 130.1(d)</b> Automatic Daylight Controls	Yes	Not Required	Not Required
<b>Section 130.1(e)</b> Demand Responsive Controls - only for alterations >10,000 sq. ft. in a single building, where the alteration also changes the area of the space, or changes the occupancy type of the space, or increases the lighting power	Yes	Not Required	Not Required

<sup>1</sup> As bilevel controls are not required for this option, partial off controls are not required to be installed in place of “full off” automatic shutoff controls; this difference is included in the analysis of anticipated energy savings.

Source: California Energy Commission staff

Note on NEW OPTION: Reduction is at least 50 percent lower compared to existing rated power at full light output for hotel, office, and retail occupancies, and at least 35 percent lower rated power at full light output for all other occupancies.

# CHAPTER 2:

## Energy Equivalency

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To assess the energy impact of the New Option relative to existing Options 1 and 2, staff used the energy impact tool developed by the Codes and Standards Team, funded by the investor-owned utilities, which was used extensively during the rulemaking and posted online. The tool uses Commercial Building Energy Consumption Survey (CBECS) data on building floor space, primary activity, vintage, and other factors to calculate energy savings from each of the standards measures. These calculated factors are combined with an estimated market share for each type of retrofit to calculate the total estimated annual energy savings achieved by each Standards compliance path for all types of lighting alterations. This tool allows for a sensitivity analysis of each of the input estimations and for easy stakeholder review of the calculations.

Using the tool, staff analyzed the energy impact of the following scenarios:

1. Entire luminaire modifications complying with Option 1
2. Entire luminaire modifications complying with Option 2
3. Entire luminaire modifications meeting 50 percent power reduction for hotel, office, and retail occupancy (New Option)
4. Entire luminaire modifications meeting 35 percent power reduction for all other occupancies (New Option)
5. Luminaire component modifications meeting lighting power density requirements (Options 1 and 2)
6. Luminaire component modifications meeting 50 percent power reduction for hotel, office, and retail occupancies (New Option)
7. Luminaire component modifications meeting 35 percent power reduction all other occupancies (New Option)
8. Lighting wiring alterations
9. Exemptions

Staff then input estimated market share for each scenario to determine the estimated total energy savings at the most probable distribution of market share among the four types of lighting retrofit projects. The analysis determined that the New Option will result in an overall increased statewide energy savings of 132 gigawatt-hours (GWh) in the first year of implementation. The results are summarized in **Table 2**, which shows the energy impact of the New Option on installed lighting power and control strategies, including area, multilevel, shutoff, and daylighting controls compared to Option 1. The additional energy savings from the New Option is due to the requirement that replacement luminaires be at least 50 percent lower rated power at full light output

than the existing luminaires being replaced for hotel, office, and retail occupancies, and at least 35 percent lower rated power at full light output in all other occupancies.

**Table 2: Energy Impact Analysis:  
New Option Compared to Existing Options**

Lighting Alteration Sub-Category	Section 140.6 LPD	Section 130.1(a) Area Controls	Section 130.1(b) Multi-level Controls	Section 130.1(c) Shut-off Controls	Section 130.1(d) Daylighting Controls	Total
1a. Entire Luminaire Alterations. Section 141.0(b)2l i. > 85% LPD	0.98	0	0	0.93	0	2.20
1b. Entire Luminaire Alterations. Section 141.0(b)2l i. < 85% LPD	3	0	0	3	0	5.72
1c. Entire Luminaire Alterations. (Hotel, Office & Retail) Section 141.0(b)2l ii., 50% power reduction	74	0	0	5	-12	67
1c. Entire Luminaire Alterations. (Other nonres building types) Section 141.0(b)2l ii., 35% power reduction	52	0	0	6	-15	43
2a. Luminaire Comp. Modifications. Section 141.0(b)2J i: >40 Luminaire / floor, meet LPD	6	0	0	5	-9	3
2b. Luminaire Comp. Modifications. (Hotel, Office & Retail) Section 141.0(b)2J ii: >40 Luminaire / floor, 50% power reduction	17	0	0	-2	-4	10
2b. Luminaire Comp. Modifications. (Other nonres building types) Section 141.0(b)2J ii: >40 Luminaire / floor, 35% power reduction	14	0	0	-4	-9	1
2c. Luminaire Comp. Modifications. Section 141.0(b)2J ii: <40 Luminaire / floor	0	0	0	0	0	0
3. Lighting Wiring Alterations.	0	0	0	0	-1	-1
4. Exempted entire luminaire alterations, luminaire component modifications, and lighting wiring alterations	0	0	0	0	0	0
Sub-Total	168	0	0	13	-49	132
Total Energy Impact Reduction	132 GWh/year					

Source: California Energy Commission staff

The result is deeper energy savings for all area category occupancies and for all vintages of lighting systems as shown in **Table 3**. **Table 3** shows greater savings for the New Option compared to Option 1 and Option 2, even for existing lighting systems that comply with the 1998 Standards. More recent lighting systems will result in even greater energy savings when complying with the New Option.

**Table 3: Weighted Average Lighting Power Densities (LPDs), by Vintage**

Function Areas:	Area Category Method Lighting Power Density (Watts/sf)				
	Standards Vintage:				
	1998 / 2001	2005	2008	2013	2016
Auditorium	0.030	0.023	0.023	0.023	0.021
Classroom, Lecture	0.141	0.106	0.106	0.106	0.106
Commercial Storage	0.083	0.083	0.083	0.083	0.083
Corridors, Restrooms, Support	0.012	0.012	0.012	0.012	0.012
Convention, Conference	0.023	0.021	0.021	0.021	0.018
Dining	0.080	0.080	0.080	0.080	0.073
Exercise, Gym	0.015	0.015	0.015	0.015	0.015
Exhibit, Museum	0.030	0.030	0.030	0.030	0.027
General Commercial High Bay	0.018	0.017	0.015	0.015	0.015
General Commercial Low Bay	0.015	0.015	0.014	0.014	0.014
General Commercial, Precision	0.023	0.020	0.018	0.018	0.018
Grocery	0.024	0.024	0.024	0.018	0.018
Hotel	0.122	0.083	0.083	0.083	0.077
Library Reading Areas	0.018	0.018	0.018	0.018	0.017
Library Stacks	0.023	0.023	0.023	0.023	0.023
Lounge	0.017	0.017	0.017	0.017	0.014
Malls	0.018	0.018	0.018	0.018	0.014
Medical and Clinic	0.053	0.045	0.045	0.045	0.045
Office	0.287	0.265	0.210	0.179	0.179
Religious Worship	0.032	0.023	0.023	0.023	0.023
Retail	0.314	0.267	0.251	0.188	0.188
Theater Area	0.014	0.014	0.014	0.014	0.014
OPTION 1 - Weighted Average LPD	1.39	1.21	1.14	1.04	1.01
OPTION 2 - 85% of 2016 LPDs	0.86	0.86	0.86	0.86	0.86
OPTION 3 - 50/35% Power Reduction	0.79	0.70	0.66	0.61	0.58
<b>Savings for Option 3 over Option 2</b>	<b>8%</b>	<b>19%</b>	<b>23%</b>	<b>29%</b>	<b>33%</b>

Source: California Energy Commission staff

Note on Table 3: The LPDs for each function area are weighted based on the estimated annual square feet of lighting alterations for each function area. The resulting weighted average LPDs for all vintages under the New Option (shown in the table as “Option 3) are lower than Option 1 and 2 LPDs, resulting in the savings shown on the bottom row of the table.

# CHAPTER 3

## Implementation

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Following approval, staff will work quickly to inform the building community and code enforcement representatives by:

- Posting compliance path documents on the Commission's website.
- Sending a notification to the Building Standards listserve.
- Publishing a *Blueprint* newsletter article detailing the change.
- Training the energy standards hotline staff on the New Option and ensuring staff members have access to the new compliance path documents.
- Updating training materials and presentations and providing them to enforcement agencies.
- Working with Energy Code Ace to update and review its tools and resources to ensure consistency with the changes.

### Enforcement

Staff has developed (and is proposing separate approval for) compliance and enforcement mechanisms necessary for demonstrating compliance. This includes forms and procedures for compliance with the percentage reduction pathway. Staff finds that the proposed forms and procedures can be directly used for demonstrating and enforcing compliance with this option despite the differences in requirements between this option and the more extensive specifications of the 2016 Standards.

### Conclusion

The proposed alternate compliance path will result in an additional 132 GWh of electricity savings per year while improving the cost-effectiveness of small and medium-sized lighting retrofit projects that may not have been viable under the current code requirements. Staff recommends approval by the Energy Commission at the earliest possible date following the requirements of Title 24, Part 1, Section 10-109. A 60-day public comment period, under Section 10-110, has been completed, and this report has been updated in response to the comments received.

# APPENDIX A:

## 2016 Title 24, Part 6, Excerpts

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### Section 141.0(b)2I

I. **Entire Luminaire Alterations.** Entire luminaire alterations shall meet the following requirements:

- i. For each enclosed space, alterations that consist of either (a) removing and reinstalling a total of 10 percent or more of the existing luminaires; or (b) replacing or adding entire luminaires; or (c) adding, removing, or replacing walls or ceilings along with any redesign of the lighting system, shall meet the lighting power allowance in Section 140.6, and the altered luminaires shall meet the applicable requirements in Table 141.0-E; or
- ii. For alterations where existing luminaires are replaced with new luminaires, and that do not include adding, removing, or replacing walls or ceilings along with redesign of the lighting system, the replacement luminaires in each office, retail, and hotel occupancy shall have at least 50 percent, and in all other occupancies at least 35 percent, lower rated power at full light output compared to the existing luminaires being replaced, and shall meet the requirements of Sections 130.1(a)1, 2, and 3, 130.1(c)1A through C, 130.1(c)2, 130.1(c)3, 130.1(c)4, 130.1(c)5, 130.1(c)6A, and for parking garages 130.1(c)7B.

**EXCEPTION 1 to Section 141.0(b)2I.** Alteration of portable luminaires, luminaires affixed to moveable partitions, or lighting excluded as specified in Section 140.6(a)3.

**EXCEPTION 2 to Section 141.0(b)2I.** In an enclosed space where two or fewer luminaires are replaced or reinstalled.

**EXCEPTION 3 to Section 141.0(b)2I.** Alterations that would directly cause the disturbance of asbestos, unless the alterations are made in conjunction with asbestos abatement.

**EXCEPTION 4 to Section 141.0(b)2I.** Acceptance testing requirements of Section 130.4 are not required for alterations where lighting controls are added to control 20 or fewer luminaires.

### Section 141.0(b)2J

J. **Luminaire Component Modifications.** Luminaire component modifications in place that include replacing the ballasts or drivers and the associated lamps in the luminaire, permanently changing the light source of the luminaire, or changing the optical system of the luminaire, where 70 or more existing luminaires are modified either on any single floor of a building or, where multiple tenants inhabit the same

floor, in any single tenant space, in any single year, shall not prevent or disable the operation of any multi-level, shut-off, or daylighting controls, and shall:

i. Meet the lighting power allowance in Section 140.6 and comply with Table 141.0-E; or

ii. In office, retail, and hotel occupancies have at least 50 percent, and in all other occupancies have at least 35 percent, lower rated power at full light output as compared to the original luminaires prior to being modified, and meet the requirements of Sections 130.1(a)1, 2, and 3, 130.1(c)1A through C, 130.1(c)2, 130.1(c)3, 130.1(c)4, 130.1(c)5, 130.1(c)6A, and for parking garages 130.1(c)7B.

Lamp replacements alone and ballast replacements alone shall not be considered a modification of the luminaire provided that the replacement lamps or ballasts are installed and powered without modifying the luminaire.

**EXCEPTION 1 to Section 141.0(b)2J.** Modification of portable luminaires, luminaires affixed to moveable partitions, or lighting excluded by Section 140.6(a)3.

**EXCEPTION 2 to Section 141.0(b)2J.** In an enclosed space where two or fewer luminaires are modified.

**EXCEPTION 3 to Section 141.0(b)2J.** Modifications that would directly cause the disturbance of asbestos, unless the modifications are made in conjunction with asbestos abatement.

**EXCEPTION 4 to Section 141.0(b)2J.** Acceptance testing requirements of Section 130.4 are not required for modifications where lighting controls are added to control 20 or fewer luminaires.

# **Appendix B:** **Lighting Alterations Savings Analysis Tool**

Four page Lighting Alterations Savings Analysis Tool appended beginning on next page.

2016 T-24 Lighting Alteration Categories, Market shares, and regulation coverage

Main-categories of Lighting Alterations	Estimated Market Shares of main-categories	Sub-Categories of Lighting Alteration	Sub-category market share in corresponding Main-category	Estimated Market Shares of Sub-categories	Regulated by 2016 T24?	Regulation by requirement type					
						140.6 LPD	130.1(a) Area Control	130.1(b) Multi-level	130.1(c) Shut-off	130.1(d) Daylighting	130.1(e) DR Control
Section 141.0(b)2I Entire Luminaire Alterations	64%	1a. Entire Luminaire Alterations. Section 141.0(b)2I i. > 85% LPD	8%	5%	Yes	Yes	Yes	Yes	Yes	Yes	
		1b. Entire Luminaire Alterations. Section 141.0(b)2I i. < 85% LPD	33%	21%	Yes	Yes	Yes	bi-level	Yes		
		1c. Entire Luminaire Alterations. (Hotel, Office & Retail) Section 141.0(b)2I ii., 50% power reduction	26%	16%	Yes	Equivalent			Yes		
		1c. Entire Luminaire Alterations. (Other nonres building types) Section 141.0(b)2I ii., 35% power reduction	33%	21%	Yes	Equivalent			Yes		
Section 141.0(b)2J Luminaire Component Modifications	30%	2a. Luminaire Comp. Modifications. Section 141.0(b)2J i: >40 Luminaire / floor, meet LPD	42%	13%	Yes	Yes	Yes		Yes		
		2b. Luminaire Comp. Modifications. (Hotel, Office & Retail) Section 141.0(b)2J ii: >40 Luminaire / floor, 50% power reduction	15%	5%	Yes	Equivalent	Yes		Yes		
		2b. Luminaire Comp. Modifications. (Other nonres building types) Section 141.0(b)2J ii: >40 Luminaire / floor, 35% power reduction	29%	9%	Yes	Equivalent	Yes		Yes		
		2c. Luminaire Comp. Modifications. Section 141.0(b)2J ii: <40 Luminaire / floor	13%	4%	No						
Section 141.0(b)2K Lighting Wiring Alterations	5%	3. Lighting Wiring Alterations.	100%	5.0%	Yes	Yes	Yes	bi-level	partial	partial	
Exempted Alterations	1%	4. Exempted entire luminaire alterations, luminaire component modifications, and lighting wiring alterations	100%	1%	No						

Total Market Share 100%

Total Market Share 100%

2016 T-24

Market Shares of regulated alterations

140.6 LPD	130.1(a) Area Control	130.1(b) Multi-level	130.1(c) Shut-off	130.1(d) Daylighting	130.1(e) DR Control
5%	5%	5%	5%	5%	
21%	21%		21%		
16.4%			16%		
21.2%			21%		
12.7%	13%		13%		
4.5%	9%		5%		
8.8%	9%		9%		
5.0%	5.0%	5.0%	5.0%	4.25%	

95% 62% 10% 95% 10%

Level of stringency compared to 2013 T-24

140.6 LPD	130.1(a) Area Control	130.1(b) Multi-level	130.1(c) Shut-off	130.1(d) Daylighting	130.1(e) DR Control
100%	100%	100%	100%	100%	
100%	100%		100%		
250%			98%		
175%			98%		
100%	100%		98%		
250%	100%		98%		
175%	100%		98%		
100%	100%	100%	98%	100%	

Savings

140.6 LPD	130.1(a) Area Control	130.1(b) Multi-level	130.1(c) Shut-off	130.1(d) Daylighting	130.1(e) DR Control
15	0	0	11	4	
59	0	0	43		
114	0	0	33	0	
104	0	0	42	0	
35	0	0	25	0	
32	0	0	9	0	
43	0	0	18	0	
14	0	0	10	4	

417 0 0 191 8

2013 T-24

Market Shares of regulated alterations

140.6 LPD	130.1(a) Area Control	130.1(b) Multi-level	130.1(c) Shut-off	130.1(d) Daylighting	130.1(e) DR Control
5%	5%	5%	5%	5%	
20%	20%	20%	20%		
14%	14%	14%	14%	14%	
19%	19%	19%	19%	19%	
10%	10%	10%	10%	10%	
5%	5%	5%	5%	5%	
10%	10%	10%	10%	10%	
0%	0%	0%	0%	0%	
5%	5%	5%	5%	5%	
0.0%	0.0%	0.0%	0.0%	0.0%	

89% 89% 89% 89% 69%

Savings (GWh)

140.6 LPD	130.1(a) Area Control	130.1(b) Multi-level	130.1(c) Shut-off	130.1(d) Daylighting	130.1(e) DR Control
14	0	0	10	4	
56	0	0	41	0	
40	0	0	29	12	
52	0	0	38	15	
29	0	0	21	9	
15	0	0	11	4	
29	0	0	21	9	
0	0	0	0	0	
14	0	0	10	4	
0	0	0	0	0	

249 0 0 181 57

2016 T-24 Market Shares of alterations subject to warehouse control requirements	2016 T-24 Warehouse shut- off control savings	2013 T-24 Warehouse shut- off control savings
5%	3	3
21%	13	12
16%	10	9
21%	13	11
13%	8	6
5%	3	3
9%	5	6
0%	0	0
5.0%	3	3
0	0	0

95% 59 55

## Impact of 2016 T-24 Lighting Alteration Requirements

Lighting Alteration Sub-Category	Section 140.6 LPD	Section 130.1(a) Area Controls	Section 130.1(b) Multi-level Controls	Section 130.1(c) Shut-off Controls	Section 130.1(d) Daylighting Controls	Total
<b>1a. Entire Luminaire Alterations.</b> Section 141.0(b)2I i. > 85% LPD	0.98	0	0	0.93	0	2.20
<b>1b. Entire Luminaire Alterations.</b> Section 141.0(b)2I i. < 85% LPD	3	0	0	3	0	5.72
<b>1c. Entire Luminaire Alterations. (Hotel, Office &amp; Retail)</b> Section 141.0(b)2I ii., 50% power reduction	74	0	0	5	-12	67
<b>1c. Entire Luminaire Alterations. (Other nonres building types)</b> Section 141.0(b)2I ii., 35% power reduction	52	0	0	6	-15	43
<b>2a. Luminaire Comp. Modifications.</b> Section 141.0(b)2J i: >40 Luminaire / floor, meet LPD	6	0	0	5	-9	3
<b>2b. Luminaire Comp. Modifications. (Hotel, Office &amp; Retail)</b> Section 141.0(b)2J ii: >40 Luminaire / floor, 50% power reduction	17	0	0	-2	-4	10
<b>2b. Luminaire Comp. Modifications. (Other nonres building types)</b> Section 141.0(b)2J ii: >40 Luminaire / floor, 35% power reduction	14	0	0	-4	-9	1
<b>2c. Luminaire Comp. Modifications.</b> Section 141.0(b)2J ii: <40 Luminaire / floor	0	0	0	0	0	0
<b>3. Lighting Wiring Alterations.</b>	0	0	0	0	-1	-1
<b>4. Exempted entire luminaire alterations, luminaire component modifications, and lighting wiring alterations</b>	0	0	0	0	0	0
<b>Sub-Total</b>	<b>168</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>-49</b>	<b>132</b>
<b>Total Energy Impact Reduction</b>	<b>132 GWh/year</b>					