California Energy Commission
Dockets Office, MS-4
Re: Docket No. 15-BSTD-01
Adoption of 15-Day Language for the 2016 Building Energy Efficiency Standards
1516 Ninth Street
Sacramento, CA 95814-5512

6/9/2015

California Energy Commission
DOCKETED
15-BSTD-01
TN # 75927
JUN 09 2015

Re: Comments of Association of Monterey Bay Area Governments Supporting Adoption of Title 24 2016 15-Day Language

Dear Commissioners of the California Energy Commission,

The AMBAG Energy Watch Program at the Association of Monterey Bay Area Governments supports the adoption of Title 24 – Part 6 2016 15-Day Language that is currently being considered. We realize that Title 24 is a consensus-driven document involving extensive review and comments among multiple parties and we support the position that the Language should not be further modified at the current time. The 15-Day Language represents an acceptable compromise that will enable programs like AMBAG Energy Watch to comprehensively serve customers and harvest project related energy savings that have been stalled since last July. We therefore support the 15-Day Language.

The AMBAG Energy Watch program strongly support these changes to the Language and believe it will greatly benefit energy efficiency efforts at Small and Medium Business customers seeking to implement energy efficient lighting retrofits. While the proposed 2016 language corrects some of the most burdensome provisions of the 2013 Code, the CEC's Impact Analysis demonstrates that the 15-Day Language will result in appreciably greater savings than the current 2013 Code. Accordingly, since the 2016 code for lighting immediately improves upon the 2013 code it is incumbent on CEC to allow the 2016 Code to be implemented by stakeholders as soon as possible after it is adopted rather than waiting until January 1, 2017.

Sincerely,

Elisabeth Russell
Special Projects Manager
Association of Monterey Bay Area Governments