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California Energy Commission
Building Energy Efficiency Standard Rulemaking - Dockets Unit
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Re: Docket # 15-BSTD-01

Remarks in support of a stipulation for separate Area Controls for General Lighting in separate Zones controlled by Automatic Daylighting Controllers.

***INTRODUCTION*:**

The treatment of General lighting in Daylit Zones under Automatic Daylighting Control as a separate lighting function in an area has not been adequately addressed.

ABSTRACT:

Further evidence to support the need to be able to energize General Lighting in separate Daylit Zones has been uncovered in the 2013 Nonresidential Compliance Manual in the section devoted to Acceptance Testing of Automatic Daylight Controls.

THE EVIDENCE:

Apart from the authors' arguments provided in prior feedback – TN-75512:

The following steps have been discovered in the 2013 Nonresidential Compliance Manual within Chapter 13, Acceptance Requirements:

13.88, Construction Inspection, Step 5: Daylit Zone Circuiting; "Further, verify that the luminaires in daylighted areas near windows are circuited separately from the luminaires in daylighted areas under skylights." …

13.88, Functional Performance Testing, Continuous Dimming Control Systems – Functional Performance Test, How to Conduct the Test and Fill the Form, Step 2: 'No Daylight' Test; "When conducting this test, the other lights in the space should be turned off."

CONCLUSION:

While many, many things in the *text* of the 2013 Nonresidential Compliance Manual are incorrect, this latter testing step shown is not one of them.

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