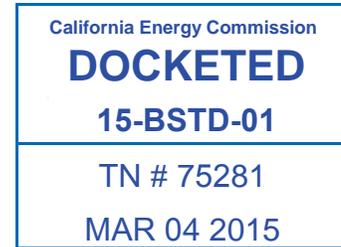


March 4, 2015

California Energy Commission  
1516 Ninth Street  
Sacramento, CA



Re:

2016 BUILDING ENERGY EFFICIENCY STANDARDS  
California Energy Commission  
DOCKET NO. 15-BSTD-01

To whom it my concern:

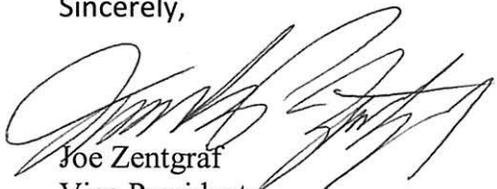
Since the requirements of Title 24 effective July 2014 and the requirements surrounding energy efficiency, our energy business has dropped off substantially. In fact to date we have NOT completed a single Title 24 energy efficiency project. The costs associated with the requirements of Title 24 have precluded us from doing energy projects under Title 24 requirements.

Based on the proposed 2016 45-Day Language, ABM Electrical and Lighting Solutions, Inc. is pleased to see the Commission is considering revising the language which will substantially increase the quality and volume of energy savings from lighting retrofits across California.

ABM Electrical and Lighting Solutions, Inc. wholeheartedly supports the proposed changes that are outlined in the 45-Day Language for 2016 Title 24 Part 6. The proposed language is reasonable and consistent and is a huge improvement over the 2013 Code. The draft language would correct critical oversights in the current Code and will resuscitate the lighting retrofit market that has all but stopped in response to the cost and complexity of implementing the current regulations. These outcomes would yield huge benefits to business owners and operators, contractors, manufacturers and distributors, energy service companies, program implementers and utilities across California.

The sooner these changes can be implemented the better for CA, CA businesses and everyone involved in this industry.

Sincerely,



Joe Zentgraf  
Vice President  
ABM Electrical & Lighting Solutions