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CONTROLLED ENERGY
Energy Efficient Lighting & Controls

California Energy Commission
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15-BSTD-01
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California Energy Commission
Attention: Docket No. 15-BSTD-01

We have reviewed the **Version 9** proposed language for indoor lighting alterations, and **support** the language enthusiastically. We feel that the changes will succeed in restarting the stalled lighting retrofit industry, which was severely affected by the 2013 Title 24 changes.

The addition of **Exception 2 in Sections 141.0(b)2I and 2J**, (mandating a 20% reduction in power consumption) **is achievable and is particularly important to the retrofit industry** if it is going to be able to harvest kWh through efficiency upgrades in the future as it has in the past. The expensive controls requirements of the 2013 Code created a barrier to that.

Likewise, the alterations to the language in **Section 141.0(b)2K** relating to **wiring alterations** removes the daylighting controls requirement, which was another barrier to lighting retrofits. We urge you to keep the new language in this Section of the Code.

Language changes for exterior fixtures is not included in the most recent release. We urge you to adopt a similar approach to the interior lighting by establishing a power-savings threshold that will exempt exterior retrofits from the controls requirements if they meet that threshold. One standard that has been discussed is 40%. In this way, the state, the lighting retrofit industry and its customers, and the planet are served and the current logjam is eliminated.

If the CEC adopts the proposed changes and crafts them in the same spirit for exterior fixtures, it is likely that the lighting retrofit industry can revive, and California can see the benefits of robust energy conservation again. But an important qualifier is **timing**.

These changes must become effective immediately, not in 2016 or 2017. Many, if not most, of the major players in the retrofit market are reeling or on the ropes. **2016 is too late for many, 2017 is too late for all**. Reiterating what I stated in my comments for the March 2-3 meeting: my company laid off 80% of its lighting technicians in 2014 and has not hired replacements to date. Prior to that, they were employed and working most of the time, one project after another. The energy conserved has diminished proportionally as a result of the barriers that the 2013 Title 24 regulations imposed, as the CEC is well-aware.

Adopt the proposed changes and make the retrofit industry whole again, or accept the fact that energy efficiency in California will continue to limp along at unacceptably low levels of productivity. And adopt them very soon, or you will find that the industry will not have the capacity to restore the kWh savings that it has over the last several decades.

You're playing with fire here, and global warming. Make the right decision.

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