DANA Electric
1338 Grove St. Apt C. Alameda, CA 94501
Tel. 510-207-2144
Calif. Contractors Lic. No. 887221
e-mail: danaelectricenergy@gmail.com

California Energy Commission
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March 1st, 2015

TO: The California Energy Commission

ATTENTION: DOCKET NO. 15-BSTD-01

I am writing in support for the proposed changes to PART 6, SECTION 141.0, to simplify energy saving retrofits to existing lighting systems.

I have been involved in the energy efficiency lighting business since 2001. I have seen a slowdown of our industry from 2014-2015, due to the introduction of the recent title 24 requirements. Those requirements have increased the cost and complexity of a simple energy saving retrofit. What were once very common decisions to make, have become labored with too much "red tape", coupled with need to meet an array of very costly and complex upgrades. This resulted in many potential customers deciding not to move forward with new and improved lighting retrofits. The implementation of new title 24 requirements have been devastating to my business and the industry in general.

After working for a couple of lighting contractors over the years, I decided to take the test for my California C-10 contractors license in 2007. I did this so that I could be involved strictly in the lighting and energy saving industry. I understand and realize the major importance of saving energy through simple retrofits. The years leading up to the change in title 24 were vibrant and sometimes hectic. As soon as title 24 went into effect my business died. Almost overnight, I was forced to switch my work back over to residential electric because there was little to no energy saving retrofits going on. I work with rebate programs and they had very little work since title 24 was implemented. Up until 2014 I employed the use of up to four workers to help me with retrofits. Due to the lack of retrofit work available, I am now a one-man show. This is disheartening, as I enjoyed employing other technicians. We've gone from a thriving industry, with the potential to employ numerous technicians, to an industry that is hanging by a thread. We need to be supported by solid simple regulations.

My suppliers are being affected as well. Instead of buying pallets of supplies, I am now only purchasing in case quantity for small jobs that are exempt under the 2014 Title 24 regulations. In 2015, I only chose to do jobs that were exempt from the 2014 Title 24 regulations. It doesn't take an expert to see how these changes have a negative ripple effect in the retrofitting industry.

I urge you to examine the Public Purpose Funds collected by the Investor Owned Utilities that fund the incentive and rebates for energy efficiency upgrades. It is my understanding that these funds are accumulating and not being allocated for efficiency upgrades. Simply, people can't request the funds if they can't comply with the 2014 Title 24 regulations. The industry is stagnant and the future seems bleak if changes aren't made for the better.

I support the proposed changes to Part 6, Section 141.0 and I strongly urge the CEC to make those changes effective on July 1, 2015 or sooner. I would really like to see a new resurgence in the lighting efficiency industry. As long the hampering regulations of the current Title 24 regulations are in effect, there is potential for the industry to become non-existent. The sooner changes are made, the easier it will be to undo damage that has already been done.

Sincerely,

Troy McPeek
Owner: DANA Electric