California Energy Commission
DOCKETED
15-BSTD-01
TN 75674
May 1 2015

InterMountain
ELECTRIC COMPANY

California Energy Commission
Attn: Docket 15-BSTD-01
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814

Re: Docket No. 15-BSTD-01; Proposed Amendments of Section 141.0(b)(2) and Table 141.0-E

Thank you for the opportunity to express my views on the following proposals:

(1) increasing the percent of luminaire replacements that would trigger Section 130.1 (a), (b), (c) and (d) control requirements from 10% of existing luminaires to 20% of existing luminaires;

(2) exempting alterations from acceptance test requirements when 20 or fewer controls are added;

(3) exempting luminaire modifications from any multi-level, shut-off or daylighting control requirements; and

(4) exempting luminaire alterations or modifications from existing lighting control or lighting power allowance requirements where the modified luminaires have at least 20 percent lower power consumption compared to the original luminaires.

I oppose all of the proposed revisions listed above, and any other similar concepts that the CEC may be looking at. These concepts would undermine lighting control and/or acceptance test requirements for alterations and modifications of indoor or outdoor luminaires.

I've also heard that the CEC may be thinking about reducing wiring alteration requirements that would reduce current control requirements – I am opposed to those as well.

The CEC has done a solid job with our current Title 24 energy efficiency regulations. I'd like to thank you for what you've done so far and strongly urge you not to go backwards on lighting controls - neither indoor or outdoor – because they are critical to progress on energy efficiency!

Increasing the definition of alterations from 10% of altered luminaires to 20% of altered luminaires greatly increases the risk that owners will stagger their lighting upgrades over a five year period in order to avoid having to meet lighting control and acceptance test requirements. The Commission should be wary of creating bigger and more attractive loopholes for avoiding code requirements. This change will come at a real cost of lost energy savings. Lighting controls

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can double the energy savings achieved during a lighting retrofit.

We do not share the concern that the higher initial costs of requiring controls and acceptance testing are creating a barrier to achieving retrofit savings. Lighting controls can double the energy savings from a retrofit. Furthermore, studies have shown that without verification testing, lighting systems are very likely to fail to provide expected savings. Encouraging more shallow and unverified retrofits rather than making sure that the retrofits that are done are deep and effective will result in substantially less overall energy savings. Furthermore, the costs to building owners will be recouped by energy savings. These proposed changes are short-sighted and misguided.

Sincerely yours,

David Signorello
President, Intermountain Electric Co

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