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California Energy Commission
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15-BSTD-01
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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

We sincerely appreciate this important opportunity to comment. Our company, Morrow-Meadows Corporation has been in the electrical contracting business for more than 50 years. We do a significant number of lighting retrofits and support the Commission's Title 24 energy efficiency goals and regulations.

We are opposed to the proposed rollback of acceptance testing and lighting control requirements. We also oppose the proposed alterations and modifications of both indoor and outdoor luminaires of existing buildings.

We oppose the following: (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.

We oppose all of the above proposals and any other proposals that the Commission may be considering that would weaken lighting control or acceptance test requirements for alterations and modifications of indoor or outdoor lighting efficiency. We would also like to clearly state our opposition to any changes to the wiring alteration requirements that would reduce current control requirements.

The proposed changes encourage building owners to stagger retrofits over a five year period in order to avoid lighting control requirements and allow shallow lamp and ballast change outs only. Please do not let an organized effort by companies that only do lamp and ballast change outs persuade you to eliminate lighting control requirements just because these requirements do not meet their business model. There are plenty of retrofit companies that also install lighting controls. Those that have not

California's energy future depends on it. Moreover, the elimination of acceptance tests for smaller installations essentially ensures that most installations will not function as intended. Studies have shown that the majority of lighting control installations no subject to acceptance tests fail to perform acceptably.

The complaints about cost and complexity regarding compliance with the 2013 lighting control requirements for alterations and modifications is overblown. Lighting control costs for area controls, multi-level lighting controls, shut-off controls and automatic daylight controls have been going down, not up. In addition, advanced lighting control manufacturers are supplying code compliant equipment, provide design support, and engineering assistance at little or no cost. Contractors who are not aware of this should spend more time educating themselves about controls, suppliers, and vendor services.

I hope my lengthy years within the industry and my statistics are met with open minds.

Much Appreciated,

***MORROW-MEADOWS CORPORATION***

Richard Jarvis

Richard Jarvis
Vice President of Construction