Greater Sacramento Chapter
Sacramento • Reno • Redding Divisions

California Energy Commission
DOCKETED
15-BSTD-01
TN # 75699
MAY 04 2015

Date: May 4, 2015

To: Docket@energy.ca.gov

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

The Greater Sacramento Chapter of the National Electrical Contractors Association (NECA) represents electrical contractors in and around the metropolitan the Sacramento, California area. Many of our members have been in business for decades and have helped build our capital region into an important center of commerce, education and government.

Sacramento NECA opposes the proposed rollback of lighting control and acceptance test requirements for alterations and modifications of both indoor and outdoor luminaires in existing buildings.

Apparently the CEC is considering a number of proposals that would weaken current lighting control requirements, including:

(I) 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;

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

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

(IV) 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.

Sacramento NECA opposes all these proposals and any other proposals that the CEC may be considering which would weaken lighting control or acceptance test requirements for alterations and modifications of indoor or outdoor luminaires. We also oppose any changes to the wiring alteration requirements that would reduce current control requirements.

The most convincing reason to oppose the proposed 2016 revisions is the statement that has been made by PG&E in their comments on this issue (docketed by the CEC on April 24, 2015).

Attached to this letter is an executive summary of PG&E's comments. In their comments PG&E states that **"In effect, the proposed lighting retrofit changes would increase electricity consumption enough to offset all of the electricity savings from both residential and nonresidential measures proposed for 2016."**

This would be a move backwards for California regulations and undermine California energy policy and goals.

Sacramento NECA urges the CEC not to make any changes in Title 24 Part 6 that would reduce requirements for lighting controls in the 2016 code.

We would like to thank the Commission and staff for this opportunity to comment.

Sincerely yours,

Fran McDermott / Executive Director /Sacramento NECA

ADDENDUM

Copy of PG&E Comments on 15 Day Proposed Changes to Nonresidential Lighting Retrofit Requirements in 2016 Title 24 Standards

CEC Docketed April 24, 2015

Docket #:15-BSTD-01 2016 Building Standards Update

Executive Summary and Recommendations

The Pacific Gas and Electric Company (PG&E), as a California Investor Owned Utility serving over 9 million customers, understands the concerns of the lighting retrofit industry about the applicability of the CEC's current lighting efficiency codes to retrofit work. Since PG&E is authorized by the California Public Utilities Commission to operate both demand side management codes and standards advocacy and incentive programs, it is also in a unique position to analyze the impacts of changes to the code that might be made to accommodate the industry's concerns.

The following report analyzes the energy savings impacts of changes currently being considered by the CEC. It estimates that that the proposed reduction in stringency would result in changed code requirements that allow retrofit lighting energy consumption to be 253 GWh/yr higher for each year's retrofit construction activity as compared to the current energy code. At the end of a three year code cycle, we expect the allowed retrofit energy consumption to be 759 GWh/yr higher than the current code.

In comparison, CEC staff is proposing four residential energy efficiency measures for inclusion into the 2016 Title 24 standards with an estimated savings of 127.3 GWh/yr and 9.3 Million therms and ten nonresidential measures with an estimated savings of 127.6 GWh/yr of electricity and 3.2 Million therms of natural gas. Total statewide savings for new proposed measures is 255.0 GWh/yr and 12.5 Million therms.

In effect, the proposed lighting retrofit changes would increase electricity consumption enough to offset all of the electricity savings from both residential and nonresidential measures proposed for 2016. Using a 3 to 1 source energy multiplier, the proposed nonresidential source energy savings are 16 Million therms, and the proposed nonresidential source energy savings losses due to the retrofit lighting proposal are 26 Million therms.

As a matter of public policy, process, and precedent, PG&E recommends that the Commission not make any changes to the current codes that would result in a loss of savings. Such changes may not merit a negative environmental impact declaration and may not allow the CEC to continue to make the required determination to the US Department of Energy that their energy efficiency standards for commercial buildings are at least as stringent as the ASHRAE 90.1 standards. The ASHRAE Standard 90.1-2010 significantly increased stringency by requiring that retrofitted systems where more than 10% of the lighting is retrofitted comply with lighting power density and a limited number of automatic control requirements.