The Joint Electrical Industry Fund Labor & Management Serving the Electrical Industry in Santa Clara County

TO: Docket@energy.ca.gov, andrew.mcallister@energy.ca.gov, Maziar.Shirakh@energy.ca.gov

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

California Energy Commission
DOCKETED
15-BSTD-01
TN # 75724
MAY 08 2015

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

We've heard that the Energy Commission is considering a number of proposals that would weaken current lighting control requirements, including: (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.

The Joint Electrical Industry Fund (JEIF) is opposed to the proposed revisions and any others that the Commission may be considering that would lessen lighting control or acceptance test requirements for alterations and modifications of outdoor or indoor luminaires. We also oppose any changes to the wiring alteration requirements that would reduce current lighting control requirements.

We feel that the Commission is on the right track with the 2013 Title 24 energy efficiency regulations on existing buildings for both indoor and outdoor lighting controls. We support the Commission is maintaining high efficiency requirements for lighting controls.

Lighting controls can double the energy savings over just putting in more efficient luminaires. By doubling the percentage of replacements that trigger lighting control requirements and allowing wholesale exemptions for lighting luminaires that reduce power consumption by 20 percent, the Commission is losing a huge amount of energy savings that would be achieved under the current code. Providing a blanket exception for acceptance testing for certain installations is also shortsighted. A 2011 evaluation of Title 24 effectiveness found that automatic day-lighting controls failed in 7 out of 7 tests, and occupancy sensors failed in 2 out of 3 tests. All of the failures were due to design, installation, or calibration issues. Allowing shallow retrofits with no verification will only lock in inefficient lighting systems for years to come.

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.

Thank you again for this opportunity to comment.

Sincerely,

Neil Struthers
Business Development Director
Joint Electrical Industry Fund of Santa Clara County