Walton Electric Corporation
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California Energy Commission
DOCKETED
15-BSTD-01
TN # 75666
APR 29 2015

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

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

My name is Ty Gray and I represent **Walton Electric Corp.**
I'm a strong supporter of the Commission's Title 24 energy efficiency goals and would like to thank the Commission and staff for this opportunity to comment.

I am writing in opposition to the proposed rollback of lighting control and acceptance test requirements for alterations and modifications of both indoor and outdoor luminaires of existing buildings. I understand that the 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. I oppose all of these 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 luminaires. I also oppose any changes to the wiring alteration requirements that would reduce current control requirements.

As a Contractor, I am surprised to hear that lighting retrofit companies are seeking to roll back current lighting control and acceptance test requirements for lighting control alterations and modifications. This is directly contrary to the direction of the Governor to adopt building standards that will substantially reduce energy consumption. The Governor's goals cannot be met by watering down existing lighting control and verification requirements. The problem with shallow retrofits is that they lock in shallow energy savings for years to come. In my experience, the 2013 code requirements have pushed our industry forward and have resulted in increased consumer satisfaction.

I would like to respond to comments that have been submitted to the Commission claiming that the 2013 Energy Code lighting control requirements for alterations and modifications

have proven to be too expensive and have resulted in customers deciding to avoid lighting retrofits altogether. I am an electrical contractor and in my experience, neither of these claims is true. My customers are recouping the cost of lighting controls with savings in electricity costs and I have not experienced a downturn in lighting retrofit jobs. To the contrary, we in this industry have seen the 2013 codes successfully push demand for lighting controls to the point that lighting control costs have significantly decreased. As a result, the lighting control requirements that were found cost-effective at the time of the 2013 Energy Code adoption are undoubtedly more cost-effective now.
Thank you again for this opportunity to comment.

Sincerely,

Ty Gray
Business Development Manager
Walton Electric Corp