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Sent: Friday, December 06, 2013 4:09 PM

To: Energy - Public Adviser's Office

Subject: Agenda Item 5. CEC-REVISED EFFECTIVE DATE OF 2013 ENERGY EFFICIENCY STANDARDS

CEC Public Adviser,

I'm writing on behalf of the California Chapters of the National Electrical Contractors Association (NECA). As an industry, we have spent significant time and resources preparing for The 2013 Building Energy Efficiency Standards. Specifically, our contractors have trained and certified approximately 200 contractors and 300 electricians (field personnel) to assist California property owners in complying with the advance lighting controls acceptance testing portions of the 2013 standards. Because of this, we are frustrated that the Commission is considering a delay in the effective date of those standards.

Although we are disappointed with the proposed delay for the reasons noted above, we fully understand and are sympathetic to the Commission's stated reasons for the proposed delay. It is our shared goal that California reach the highest level of energy efficiency in all of its public, commercial and residential properties as soon as possible. Functional and attainable standards are a key to that goal and for these reasons we are not formally opposed to the proposed six month delay. However, if plausible, we ask that the commission consider an exception be made as follows:

1. The 2013 Title 24 regulations on lighting and lighting controls go forward on January 1, 2014. (All systems other than lighting and lighting controls be delayed.)
2. The new lighting and lighting controls code implementation apply exclusively to buildings that are being retrofitted where less than 100% of the space is affected.
3. New buildings and whole building retrofits be exempted, including the new lighting and lighting controls portions, until the full code goes into effect.
4. Only the prescriptive approach be applied to the effected projects. (This will negate the 2013 Public Domain Residential and Nonresidential California Building Energy Code Compliance (CBECC) software issues.)

This alternate proposal will allow California to begin to benefit from lighting related energy savings as soon as possible. In addition, The 2013 update represents a significant body of changes and it will take some time for the market to get up to speed on all of its aspects. A phased-in application of the new energy efficiency standards would allow property owners, contractors, building departments, inspectors, etc. to ease into the new code and be better prepared for full implementation.

Thank you for your time and consideration,

Eddie Bernacchi

NECA Legislative and Regulatory Advocate

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