

## **Fiese, Hilary@Energy**

---

**From:** Yasny, Ron@Energy  
**Sent:** Monday, December 09, 2013 1:10 PM  
**To:** Fiese, Hilary@Energy  
**Subject:** FW: Vote to delay Title 24 for retrofit market

---

**From:** Jeff Johnson [mailto:jeff.johnson@fsgi.com]  
**Sent:** Friday, December 06, 2013 9:30 AM  
**To:** gary.flamm@energyca.gov; Yasny, Ron@Energy; Douglas, Karen@Energy  
**Cc:** Jared Johnson; john@fscighting.com  
**Subject:** RE: Vote to delay Title 24 for retrofit market

Good morning ladies and gentleman,

I also want to thank you your service and your efforts to keep California at the forefront of the energy movement.

I have been in the energy efficient lighting retrofit business for 25 years, completing hundreds if millions of dollars of retrofits, and have seen many transitions brought on by technology and regulations. The new Title 24 regulations are definitely game changers and destine to keep California as the leader in energy efficiency ( I have attended many seminars and meetings with out of state business people and they are all aware of the new regulations).

The evolution of lighting to LEDs is perfect timing to incorporate the new regulations. We have retrofitted a number of buildings three and four times over the years and we have squeezed the majority of the savings out of each fixture dropping many from 192 watts down to the industry standard of 40 watts – reducing more will require an investment that generates a longer payback than most business owners are willing to accept. Advanced lighting controls, as required in the new regulations, will be needed to maximize the savings by reducing hours and light output levels.

We applaud the new regulations and have been working hard to become educated and prepared for the major transition. We have probably close to one thousand hours invested in training, including becoming CALCTP certified and having certified ATs on staff, but we still suffer with a lot of unanswered questions that will shape how effect the regulations are for the retrofit market. The main question we are looking for answers to is, “will there be rebates and if so, how much”? The utilities have told us that they might not offer rebates since they feel there is no reason to pay a rebate on something that is required under the regulations. They have also said they are not sure if they will require a permit (most of our projects do not require permits) to get a rebate.

Even with all of the training and preparation we have done, our customers are not ready to look at needed projects until “the dust settles” and they have a better understanding of the economics of a project. We have a number of large projects that customers are electing to give up the rebate, if necessary, to do a standard lamp, ballast and occupancy sensor project instead of the long payback, Title 24 compliant project.

We would like to ask you to postpone the implementation of the new Title 24 regulations till at least July for retrofit projects or until all effective organizations (utilities, city building departments, manufacturers, contractors, etc.) have had a chance to assemble plans on how they will handle the new regulations.

Thank you,

**Jeff Johnson, CLMC, CLEP**  
Division Manager

FSG California  
 [\(714\) 237-9970](tel:(714)237-9970) x 14456  
Fax: (714) 237-9958  
[jeff.johnson@fsgi.com](mailto:jeff.johnson@fsgi.com)  
[www.fsgi.com](http://www.fsgi.com) - FSG Video Profile: [click here](#)

---

**From:** John Watkins  
**Sent:** Friday, December 06, 2013 5:33 AM  
**To:** '[Pedro.Gomez@energy.ca.gov](mailto:Pedro.Gomez@energy.ca.gov)'; '[gary.flamm@energy.ca.gov](mailto:gary.flamm@energy.ca.gov)'; '[Ron.Yasny@energy.ca.gov](mailto:Ron.Yasny@energy.ca.gov)'; '[Karen.Douglas@energy.ca.gov](mailto:Karen.Douglas@energy.ca.gov)'  
**Subject:** Vote to delay Title 24 for retrofit market

Thank you very much for your service. I am writing you to ask you to seriously consider delaying the implementation of Title 24 until July at the minimum to the lighting retrofit market on your vote on December 11<sup>th</sup>.

As a California based manufacturer of fluorescent and LED high efficiency products that supports the retrofit contractor market, it's been abundantly clear that our industry, the customers and most of all the utilities are not properly equipped and trained to deal with these new standards. Our local sales team meets regularly with the key installers and utility groups and are constantly receiving a barrage of questions about what the new standards mean, how to design projects and what rebates if any they will receive.

If the contractors that design and build these major retrofit projects do not understand how to do it, then the customers are not going to be educated either (if the teacher cannot teach the subject, then the kids cannot learn it).

The contractors that I speak to are telling me that the additional expense involved in meeting their understanding of the Title 24's new standards will exceed the value of the rebate. If this is accurate than CA will end up with a retrofit "Black Market" where contractors and end users will do basic retrofits without a rebate. They will not permit the job and will not comply with Title 24.

CA's utility costs are so high that retrofitting without a rebate can still be compelling enough to execute and if meeting Title 24 standards increases the costs beyond the value of the rebate and hurts the project's payback..... We see this happen in other states where the costs of permitting are so high that customers and contractors work together to bypass the system and perform the work on their own.

A lot more training and explanation needs to happen before CA can reasonably expect contractors and end users to embrace these new standards and then implement them. This is especially true in the retrofit market which has never really had to deal with permitting in order to get a rebate.

Please vote to delay the implementation of Title 24 until July at the minimum.

Best Regards,

John Watkins  
President

**fluorescentsupplycompany**

12120 east altamar place | santa fe springs | ca 90670



 Please consider the environment before printing this e-mail

**CONFIDENTIALITY NOTICE:** This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free for numerous reasons. The sender therefore does not accept liability for any errors or omissions of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version.