

Fiese, Hilary@Energy

From: Yasny, Ron@Energy
Sent: Monday, December 09, 2013 1:09 PM
To: Fiese, Hilary@Energy
Subject: FW: Title 24 Lightng Implementation Strong Recommendation Against

From: Paul Chamberlain [<mailto:pchamberlain@enpronow.com>]
Sent: Friday, December 06, 2013 10:05 AM
To: Gomez, Pedro@Energy; Flamm, Gary@Energy; Yasny, Ron@Energy; Douglas, Karen@Energy
Subject: Title 24 Lightng Implementation Strong Recommendation Against

Members,

My company develops & installs energy efficiency technologies to commercial and industrial facilities in California. We've been doing this for 11 years.

I am writing to express my strong recommendation to delay, modify, or even eliminate Title 24 Lighting requirements for retrofiting facilities.

I feel that the Title 24 Lighting Control requirements will devastate the retrofit industry. I will keep this real simple as to why in some bullet points:

- Most of our lighting business today is installing LED technology. This is reducing consumption by 50-90% using existing lighting controls.
- Retrofitting existing facilities with controls that are compatible with Title 24 is very expensive relative to the cost of the LED technology as a stand-alone measure. For many proposals that we have prepared lately, the compliant controls costs exceeded the LED costs.
- After LED reduces consumption by 50-90%, adding the costs of expensive compliant controls to save a few more watts extends the payback on lighting projects out to 6-10 years, from 1-3 years.. This exceeds 95% of any private company's investment criteria for new projects. Thus, my conclusion that Title 24 Lighting Controls will destroy the retrofit industry.

For new buildings, I can understand including these controls. For retrofitting, this will be devastating. I would recommend directing requirements toward LED technologies, and not put forth expensive lighting control requirements that cannot be economically justified by the private sector. If the pending Title 24 Lighting Controls move forward, you are actually encouraging the market place to waste energy because the lighting upgrades will not be able to be justified and, thus, will not occur.

I can be reached by my cell phone for any discussion.

Regards,

Paul Chamberlain
President
C: 559-906-7285
O: 559-435-6008, Nor Cal
O: 951-302-5026, So Cal
F: 559-435-6048
pchamberlain@enpronow.com
www.enpronow.com
License #: 913831, General & Electrical Contractor



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