



**ALAMEDA  
MUNICIPAL POWER**

A Department of the City of Alameda

November, 10, 2015

California Energy Commission

**DOCKETED**

**15-BSTD-01**

**TN # 76342**

**NOV 10 2015**

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

Re: 2016 Building Standards Update; 15-BSTD-01 Rulemaking Comments of Ecology Action on  
Lighting Alterations Language

Dear Sir/Madam:

Alameda Municipal Power (AMP) is a municipal utility that has provided safe, cost-effective, highly-reliable and environmentally responsible, electric-energy services since its founding in 1887. AMP takes pride in its reliability, renewable power portfolio and customer-centric focus.

AMP's resource portfolio has renewable resources and contracts that cover more than 60 percent of Alameda's load requirement. And, if hydro is included, AMP energy supply is close to 90 percent carbon free. For the past few years, AMP has capitalized on the Renewable Energy Credit (REC) market by selling excess credits into the marketplace. This short-term sale of RECs has reduced AMP's renewable percentage to the State-mandated level. Funds from these sales are earmarked for the addition of local renewable resources and energy efficiency.

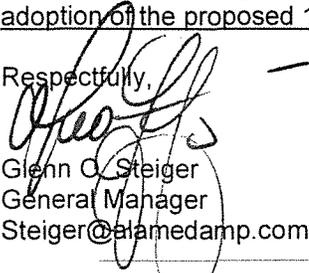
AMP has provided energy efficiency programs since 1991 that cover all customer sectors and nearly all electric end uses including a non-residential direct install lighting program. There is virtually no residential, limited non-residential air-conditioning, and minimal industry in Alameda. In general, most of Alameda's building stock is relatively old. On average at least 60 percent of AMP's energy efficiency portfolio is non-residential lighting retrofits. Non-residential lighting retrofits are expected to continue to provide the largest energy efficiency savings to AMP.

The Title 24 – 2013 Standards, effective July 1, 2014 for retrofitting existing lighting, are overly burdensome in terms of additional cost and complication to our customers. We are concerned that many of our customers have responded to the new rules by simply not retrofitting old equipment due to the additional costs and complexity associated with Title 24. The largest part of the additional cost is the requirement for extensive lighting control systems along with the cost to prepare the Title 24 calculations and building permit. Also, it is not certain that these extensive lighting control systems are as effective as claimed in reducing energy use.

With the recently enacted Senate Bill 350 utilities will need to increase their energy efficiency savings targets. The Title 24 – 2013 Standards represents our largest barrier to achieving these higher targets.

The proposed 15-day Language is a compromise between all stakeholders. Therefore, AMP strongly endorses the adoption of the proposed 15-Day Lighting Alterations language.

Respectfully,

  
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