Community Energy Services Corporation
CESC

Contributing to our Community
Since 1986

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California Energy Commission
DOCKETED
15-BSTD-01
TN # 75883
JUN 05 2015

June 4th, 2015

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 15-BSTD-01
Adoption of 15-Day Language for the 2016 Building Energy Efficiency Standards
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Comments of Community Energy Services supporting adoption of Title 24 2016 15-Day Language

Dear Commissioner McAllister,

Community Energy Services (CESC) is a 501(c)(3) community-based organization that has delivered energy, environmental, and home repair services to Bay Area residents since 1986. CESC's SmartLights Program is a member of East Bay Energy Watch, Marin Energy Watch, and is an energy efficiency program through Marin Clean Energy providing energy efficiency assessments, installations and project management for lighting and refrigeration retrofits.

In our experience the 2013 standards have been counter-productive for our retrofit projects and have substantially reduced the number of projects being installed through the SmartLights Program, reducing the savings achieved by our Program. We have seen energy efficiency retrofits to existing buildings drastically curtailed, additionally, since the 2013 Code took effect stakeholder our per-project savings has been greatly reduced and less comprehensive due to the overly stringent requirements in Title 24 2013.

Here are some impacts on the SmartLights Program since the 2013 Standards have been in effect:

Interior linear fluorescent retrofits have decreased. *As a percentage of our total lighting savings, interior linear fluorescent kWh savings invoiced dropped by 42% (from 19% to 11%).*

Exterior retrofits have decreased. *As a percentage of our total lighting savings, exterior lighting kWh savings dropped by 38% (from 45% to 28%). Exterior lighting projects are not being pursued due to the low threshold for triggering code in exterior applications.*

Lamp-only jobs are displacing more comprehensive retrofits. *Lamp-only jobs (screw-in and pin-based replacements) as a percentage of total lighting savings jumped from 20% to 38%, an increase of 90%.*

We would much prefer a 2016 Code that has fewer mandatory controls requirements for lighting retrofits than those proposed in the 15-Day Language. However, Title 24 is a consensus-driven document involving extensive give and take among multiple parties and it should not be further modified at this late date. As such, we feel that the 15-Day Language represents an acceptable compromise that will enable us to survive and regain the jobs and energy savings that have been lost since last July. We therefore support the 15-Day Language, and encourage its adoption.

Sincerely,

Martin Bond
CESC – Executive Director