California Energy Commission
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From: Adam Procell [mailto:aprocell@lime-energy.com]
Sent: Friday, October 23, 2015 9:36 AM
To: Martha.Guzman-Aceves@gov.ca.gov; Cross, Catherine@Energy; Awolowo, Ollie@Energy; McDonnell, Kathleen@Energy; Parrow, Donna@Energy; Brousseau, Amie@Energy; Chandler, Tanya@Energy
Subject: ESI Comments re: Docket 15-BSTD-01

Dear Governor Brown and CEC Commissioners:

Please find attached a letter of support for the improvements proposed by CEC staff to Title 24 as it relates to the newly regulated lighting retrofit industry (since summer 2014). As adopted, T-24 2013 creates considerable challenges for lighting efficiency practitioners and has delayed/stopped adoption of many promising high efficacy lighting upgrade projects. The lighting efficiency industry, without any previous Title 24 regulation, has consistently delivered energy saving and cost savings to the taxpayers and ratepayers of California over the past 30+ years. The alternative methods of compliance proposed by the CEC staff should be considered and adopted. The proposed improvements will put California back in a leadership position and enable businesses to rapidly adopt high efficacy LED lighting retrofits in existing spaces. The lighting efficiency industry has developed game changing high efficacy LED lighting technologies and is poised to deploy them rapidly to businesses throughout CA. Thank you for your consideration, a remarkable opportunity awaits.

Adam Procell
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Martha Guzman-Aceves, Deputy Legislative Affairs Secretary
Office of the Governor
State Capitol, First Floor
Sacramento CA 95814

October 22, 2015

Dear Governor Brown,

Hundreds of skilled jobs in the lighting retrofit industry are being lost and California's ability to meet its energy efficiency and greenhouse gas reduction goals is being compromised by the unintended consequences of a critical section of Title 24 2013. California Energy Commission staff has been working with the stakeholder community for the last year to develop language that will correct the oversights in the current Code. In June CEC staff presented the proposed 2016 Title 24 Code to Commissioners, who approved all chapters except Sections 141.0(b)2.I., J., K., and L., and Tables 141.0-E and –F, which is all the language dealing with lighting system Alterations and Modifications. Approval on this language was delayed to address concerns about the quantity of energy savings that would result from the proposed changes. CEC staff have since confirmed that the proposed 2016 15 Day Language for these sections will indeed generate greater energy savings, and the item was placed on the agenda for CEC meetings on August 12 and again October 14. However, both times this topic was pulled from the agenda without explanation.

If the CEC does not make a decision on this issue during their Thursday November 12 business meeting, the current flawed 2013 language will remain in force until 2020, effectively blocking a large group of utility ratepayers from upgrading their lighting systems and greatly damaging an already reeling lighting retrofit industry. The proposed Code language represents a hard-won compromise between conflicting interests that will deliver significantly greater energy savings than the current Code. We urge you to direct the CEC Commissioners to hear and approve the proposed Code during their November meeting.

BACKGROUND

The 2013 update to Title 24 took effect last July and put in place significantly increased standards for lighting retrofits, essentially treating them much more like new construction. However, while many of the new requirements make sense for new construction and major renovations, they are not appropriate nor affordable when applied to retrofit situations. These new requirements have greatly increased job costs and complexity for lighting retrofits but delivered little if any corresponding increase in energy savings. Instead of driving greater energy savings from lighting retrofits, these sections of Title 24 2013 are unfortunately motivating customers to simply maintain their existing inefficient but functional lighting systems rather than upgrading their equipment. This is stranding potential savings and hindering California's ability to hit its energy efficiency and GHG reduction targets.

The energy savings and industry impacts described above are supported by docketed evidence provided to CEC by dozens of stakeholders that document the unintended consequences of the 2013 Code. Tens of millions of kilowatt-hours of potential savings are being stranded as potential customers routinely reject Code-triggering proposals. Lighting contractors and maintenance firms that have been in business for decades have cut staff or closed their doors entirely, and lighting distributors and recyclers have seen steep declines in their sales to the retrofit market. For lighting retrofits in the existing built environment, the 2013 Code's assumed savings are simply not being achieved.

CONCLUSION

The proposed 2016 15-Day lighting system Alterations and Modifications language is a consensus document that incorporates a great deal of stakeholder involvement and compromise. While none of the parties are completely happy with every provision, the proposed language is broadly acceptable to the Lighting Retrofit Industry because it reflects market realities and provides much-needed relief by correcting the most critical deficiencies in the current Code that have been blocking thousands of projects and stranding savings. CEC's thorough engineering analysis and calculations demonstrates that the proposed Alterations language will deliver substantially more real-world savings than 2013 Code.

CEC's procedural timeline requires an up or down decision on the 2016 update to Title 24 by November 12. If that vote does not take place next month CEC will be unable to make any changes to current Code until 2020. That would be the death knell for a large portion of lighting retrofit industry in California, and the State will fall significantly short of achieving its ambitious energy efficiency and greenhouse gas reduction goals. For all these reasons, it is essential that the Governor urge the Commission to adopt the proposed 2016 15-Day Language at its upcoming November 12 business meeting.

Respectfully,

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