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

RE: Docket 15-BSTD-01: Opposition to New Compliance Path for Lighting Alterations and Modifications, Section 141.0, subsections (b)2I, (b)2J & (b)2K.

My name is Michael Doherty, and I am an Electrical Inspector and the President of the San Francisco Chapter Electrical Inspectors Association. Our organization is comprised of the Electrical Inspectors who work for the City and County of San Francisco. We are concerned about some of the current 15 day language proposed changes to California Code of Regulations Title 24, Part 6. In particular, we are concerned with the ability of Electrical Inspectors to adequately enforce the applicable regulatory goals on lighting retrofits under the proposed changes.

San Francisco has in excess of 105 million square Feet of office space. Under the proposed relaxed regulations, luminaire retrofits which are 30 percent more efficient may be substituted for the installation of new, high efficiency lighting systems with advanced controls. Permits for alteration are granted for work that is to be done. Installations performed prior to the permitted work, unless subsequently affected by the permitted work, are not inspected. These proposed retrofits, if they are to have verifiable regulatory compliance, would require the Authority Having Jurisdiction to inspect and document the power rating of the existing lighting system. Only with that documented baseline level could compliance be evaluated.

In a high density office locale, like San Francisco and others, the scheduling demands on inspection personnel can have an enormous impact on building owners, tenants, and contractors. To include an additional scheduling item, in order to baseline a property, will only impede the local authority from ensuring regulatory compliance. Therefore, we do not see any practical way to enforce the proposed 30 percent more efficient lamp option.

In addition, property owners and lighting contractors will have the economic benefit of lower cost motivating them to claim that a 30 percent reduction has been achieved. We would like to believe that the honor system translates into ideal code compliance. However, if that were true building inspectors would not be needed.

If the California Energy Commission seeks, through Title 24, to increase the energy efficiency of commercial space, then it needs to realize that utilizing outdated technology is nothing more than stop gap legislation. Only through the installation of state of the art, high efficiency lighting

systems that can be controlled locally, remotely, and eventually at a utility level, can we ensure that the State's energy needs and goals are met. The daylighting and multi-level controls in the 2013 code should be expanded for 2016, not optioned out.Creating excess energy capacity through innovative energy efficient building design is but one of the tools necessary for our State to remain competitive. It also provides for the environmental gains required by other statutes. Inspection may just be one step in the pathway of innovation to installation, but it is through inspection that the regulatory goals of California are properly implemented. In closing, I want to thank you for the opportunity to provide feedback on this very important issue, and for all the work you do on behalf of the people of California.

Sincerely,

Michael F. Doherty

Michael F. Doherty
President,
San Francisco Electrical Inspectors Association

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