ABM Building Value

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California Energy Commission
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CALIFORNIA ENERGY COMMISSION
Attention: Docket No. 15-BSTD-01
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Re: 2016 Building Standards Update; 14-BSTD-01 Rulemaking Comments

To Whom It May Concern,

On behalf of ABM Electrical and Lighting Solutions, Inc., I respectfully submit the following comments concerning the 45 Day Language of California's 2016 Building Energy Efficiency Standards (Title 24 Part 6).

ABM is a California-based company specializing in designing and delivering energy efficiency projects across the state. During the past 30 years, ABM has implemented millions of dollars' worth of energy efficiency projects throughout California reducing energy for thousands of California utility ratepayers.

Our comments here specifically address Version 9 of the proposed 2016 45 Day Language dealing with indoor lighting system Alterations and Modifications (06-Mazi-Subchapt_6_-_141 0_Nonres Lighting Alterations-v9) dated March 10, 2015.

The complexity and costs of the 2013 Code have brought the lighting retrofit industry to a virtual standstill. We appreciate the willingness that CEC staff and consultants have shown working with all stakeholders to develop sensible solutions that correct these unintended consequences, and we are pleased that this work has produced good results thus far.

ABM fully supports Version 9 of the proposed language for Indoor Lighting Alterations in its entirety. In particular, we feel the following Exceptions are critically important and should not be subject to further modification:

EXCEPTION 2 to Section 141.0(b)2I. *"For work consisting of only luminaire replacements per ii above, where replacement luminaires have at least 20 percent lower power consumption compared to the original luminaires."*
and
EXCEPTION 2 to Section 141.0(b)2J. *"Replacement of luminaire components where the modified luminaires have at least 20 percent lower power consumption compared to the original luminaires."*

In addition, we believe the proposed Wiring Alterations language in Section 141.0(b)2K properly applies daylighting controls to large projects only, while not creating barriers for small and medium projects where the associated costs are unacceptable to the retrofit market. This language should remain as currently proposed in Version 9.
Finally, Version 9 does not address Exterior Lighting Alterations. We believe that additional work is sorely needed here.

Our suggestion is to add an Exception for exterior fixture replacements such that Code is not triggered so long as replacement luminaires have at least 40 percent lower power consumption compared to the original luminaires. We believe this proposed Exception is critically important for exterior projects.

We are also suggesting an Exception so that existing controls are allowed when 5 or fewer luminaires are replaced, and so that Time Clocks will not be required when 12 or fewer luminaires are replaced. Photocells and Occupancy-Off or Partial-Off controls would still be required. We believe this would help lessen the burden on small exterior jobs. We look forward to see the effect these changes have on the Code and to ensure that the 2016 Code promotes rather than hinders energy savings in the lighting retrofit marketplace.

Respectfully,

Joe Murnin
Vice President