California Energy Commission
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BEFORE THE CALIFORNIA ENERY COMMISSION

Docket No. 15-BSTD-01

COMMENTS OF THE

AMBAG ENERGY WATCH PROGRAM

ON

PROPOSED REVISIONS TO THE CLAIFORNIA BUILDING

ENERGY EFFICIENCY STANDARDS

CALIFORNIA CODE OF REGULATIONS, TITLE 24,

PART 1, CHAPTER 10, and PART 6,

(CALIFORNIA ENERGY CODE)

2016 BUILDING EFFICEINCY STANDARDS

California Energy Commission

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The AMBAG Energy Watch program wholeheartedly supports the proposed changes that are outlined in the 45-Day Language for 2016 Title 24 Part 6. The proposed language is reasonable and consistent and is a huge improvement over the 2013 Code. The draft language would correct critical oversights in the current Code and will resuscitate the lighting retrofit market that has all but stopped in response to the cost and complexity of implementing the current regulations. The AMBAG Energy Watch program is a regional energy efficiency program and as such we have direct energy efficiency retrofit experience.

Since July 1, 2014 building code changes have increased project costs and complicated efficiency solutions to a point that has made all but the smallest lighting efficiency upgrade opportunities (39 modifications or less) unrealistic for owners and tenants of existing California commercial facilities. The California Energy Commission, aware of these unintended consequence and has proposed the current revisions to California building energy efficiency standards that would relax the most important of these restrictions. The proposed language provides exemptions from Code compliance in the case of:

> "One for one replacement of luminaires where the new luminaires have the same or lower power consumption compared to the original luminaires"
>
> And:
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> "One for one replacement of luminaire components where the modified luminaires have the same or lower power consumption compared to the original luminaires"

Given that the focus of energy efficiency retrofit projects is the installation of new luminaires or modifications to luminaires resulting in lower power consumption; these proposed exemptions effectively allow energy efficiency providers to once again comprehensively address commercial projects of all sizes.

AMBAG Energy Watch fully supports the proposed changes that are outlined in the 45-Day Language for 2016 Title 24 Part 6 and thanks the California Energy Commission for these proposed changes.

Respectfully submitted,

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