



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

California Energy Commission

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15-BSTD-01

TN # 75709

MAY 07 2015

Re: Docket No. 15-BSTD-01; Proposed Amendments of Section 141.0(b)(2) and Table 141.0-E

We've heard that the Energy Commission is considering a number of proposals that would weaken current lighting control requirements, including: (1) increasing the percent of luminaire replacements that would trigger Section 130.1 (a), (b), (c) and (d) control requirements from 10% of existing luminaires to 20% of existing luminaires; (2) exempting alterations from acceptance test requirements when 20 or fewer controls are added; (3) exempting luminaire modifications from any multi-level, shut-off or daylighting control requirements; and (4) exempting luminaire alterations or modifications from existing lighting control or lighting power allowance requirements where the modified luminaires have at least 20 percent lower power consumption compared to the original luminaires.

HMT Electric, Inc. is opposed to the proposed revisions and any others that the Commission may be considering that would lessen lighting control or acceptance test requirements for alterations and modifications of outdoor or indoor luminaires. We also oppose any changes to the wiring alteration requirements that would reduce current lighting control requirements.

We feel that the Commission is on the right track with the 2013 Title 24 energy efficiency regulations on existing buildings for both indoor and outdoor lighting controls. We support the Commission in maintaining high efficiency requirements for lighting controls.

As a Contractor, I am surprised to hear that lighting retrofit companies are seeking to roll back current lighting control and acceptance test requirements for lighting control alterations and modifications. This is directly contrary to the direction of the Governor to adopt building standards that will substantially reduce energy consumption. The Governor's goals cannot be met by watering down existing lighting control and verification requirements. The problem with shallow retrofits is that they lock in shallow energy savings for years to come. In my experience, the 2013 code requirements have pushed our industry forward and have resulted in increased consumer satisfaction.

I would like to respond to comments that have been submitted to the Commission claiming that the 2013 Energy Code lighting control requirements for alterations and modifications have proven to be too expensive and have resulted in customers deciding to avoid lighting retrofits



altogether. I am an electrical contractor and in my experience, neither of these claims is true. My customers are recouping the cost of lighting controls with savings in electricity costs and I have not experienced a downturn in lighting retrofit jobs. To the contrary, we in this industry have seen the 2013 codes successfully push demand for lighting controls to the point that lighting control costs have significantly decreased. As a result, the lighting control requirements that were found cost-effective at the time of the 2013 Energy Code adoption are undoubtedly more cost-effective now.

Thank you very much for hearing this issue and carefully consider the implications to the industry and California's energy goals before making short-term decision.

Brian Hudak
President
HMT Electric, Inc.