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

Subject: 2016 Building Energy Efficiency Standards, Section 141.0
Docket No. 15-BSTD-01

The Los Angeles Department of Water and Power (LADWP) maintains a large portfolio of energy efficiency incentive programs. The 2013 Code has had a severe impact on several of our programs targeted at commercial lighting retrofits, but none more so than our Small Business Direct Install (SBDI) program.

After adoption of the 2013 Code, SBDI projects had to be artificially scaled down in order to remain cost effective by not being subject to the new requirements for lighting controls and code compliance. This was necessary because under our SBDI program, LADWP pays the full cost of materials and labor to install the energy efficiency retrofit measures in our small business customers' facilities, and the rewiring requirements simply become too much for this program model to bear.

As a result of the 2013 Code changes, the most common lighting retrofit projects including luminaire-modifications-in-place and one-for-one replacements of luminaires of a scope larger than 39 fixtures or 10 percent were no longer economically feasible. Compliance with the 2013 Code requires time clock or occupancy sensing and dimming lighting controls, wiring modifications to install these control devices, engineering for plan preparation and plan check verification. All of these new requirements substantially increase the cost and complexity of large scale projects. Under the 2013 Code, the amount of energy savings that was achievable under previous codes was simply not possible with the Program's budgetary constraints. As a result, projects were capped at 39 fixtures or 10 percent and the existing low efficiency lighting in use in many commercial businesses across the City remained in operation and could not be retrofitted under our incentive program.

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The LADWP supports the California Energy Commission's (CEC) effort to make the 2016 Code more retrofit friendly.

The LADWP supports the changes proposed by the CEC to Section 141.0 of 2016 Title 24, Part 6 as presented on March 3, 2015, with the following changes and clarifications:

LADWP supports the proposed language for Section 141.0(b)2.I.

LADWP supports the requirement that one-for-one replacement of luminaires use 20 percent less power than existing luminaires under Exception 2 to Section 141.0(b)2.I.

LADWP supports the requirement that luminaires with component alterations use 20 percent less power than existing luminaires under Exception 2 to Section 141.0(b)2.J.

LADWP supports the CEC's decision to specify the 20 percent power reduction under these two Exceptions in lieu of code compliance with Section 140.6. A power reduction per fixture allows lighting alterations to go forward that can be field verified rather than having to be shown on plans, with energy calculations and be approved by plan check.

LADWP supports the proposed language for Section 141.0(b)2J, except for the sentence that reads:

> *Lamp replacements alone and ballast replacements alone shall not be considered a modification of the luminaire provided that the replacement lamps or ballasts can be installed and powered without modifying the luminaire.*

This sentence should be split into two sentences to improve clarity. The text should be modified as follows:

> *Lamp replacements alone shall not be considered a modification of the luminaire provided that the replacement lamps can be installed and powered without modifying the luminaire.*
>
> *Ballast replacements alone shall not be considered a modification of the luminaire provided that the replacement ballasts can be installed and powered without modifying the luminaire.*

LADWP supports the proposed language for Section 141.0(b)2K, provided the disconnection of existing wiring for the purpose of a one-for-one luminaire replacement described under Exception 2 to Section 141.0(b)2.I would not be considered a wiring alteration.

LADWP supports the proposed Table 141.0-E with a change to the title of the table as follows:

Table 141.0-E Control Requirements for Entire Luminaire Alterations

The intent of this change is to clarify that the requirements of Table 141.0-E are only triggered when required by Section 141.0(b)2.I and are not required for any other type of lighting system alterations including luminaire component alterations and luminaire wiring alterations.

The LADWP supports these changes to Section 141.0 with respect to lighting alterations and would support and encourage that the final language be adopted by emergency adoption to replace the current lighting alteration requirements in the 2013 code.

If you have any questions, please call Jim Kemper, of my staff, at (213) 367-5095.

Sincerely,

David Jacot, P.E.
Director of Efficiency Solutions
Los Angeles Department of Water and Power

JK:nph

c: Mr. Jim Kemper