NEW LIGHT
ENERGY DESIGN

465 Barneveld Avenue San Francisco, CA 94124 **T** 415.488.5267 | **F** 415.684.7783 www.newlighted.com

California Energy Commission
DOCKETED
15-BSTD-01
TN # 75239
MAR 02 2015

Docket No. 15-BSTD- 01

5/2/15

Docket@energy.ca.gov
adrian.ownby@energy.ca.gov

To whom it may concern,

Upon graduating from Presidio Graduate School with a Masters in Sustainable Management, I partnered with a C-10 electrician and started New Light Energy Design. Our sole purpose was to do our part to help reduce kw demand and generate carbon savings. The rebate programs gave us a chance to do this. We mastered the programs, working throughout the bay area through the various 3rd party programs, to maximize the rebate and minimize job cost for our customers.

For a while, we were able to find success. We started in my partner's apartment around the kitchen table and within 3 years we were in a 3,00 square foot office/ warehouse with two vans and a busy operation. At our peak we were employing 23 people – 8 in the office and an installation staff of 15, plus 8 independent contractor sales people. Over five years we completed over 1,100 lighting upgrade installations in the Bay Area. In total, we provided $2.9MM a year in energy savings for our customer, resulting in 10,546,340 lbs. of annual carbon reductions.

At the end of 2012 we nearly killed ourselves installing the last of T12 rebate jobs, taking on and successfully installing overflow jobs from Right Lights and SF Energy Watch. In Q1 2013 our business lost $100,000 as waited for the programs to re-launch – for the most part as the programs were waiting for PGE who was waiting for CPUC direction. Thankfully we weathered the storm and got our feet back underneath us with LED lighting. At the end of 2013 when the writing was on the wall with Title 24 we opted to close the operation rather then weather another period of uncertainty. In 2014 SF Energy Watch fell way off their targets, presumably as a result of loss of our activity, which in 2013 accounted for the large majority of energy savings generated through the program. I am now working on building a business with no employees and no overhead as a way to continue to create impact without so much overhead risk. It's wonderful to have policy and programs to stimulate job growth and energy savings, but it's a disservice and counter productive when political seasonality and lack of stakeholder engagement in effect turns a back on the contractors and industry that is vital to achieving energy reduction goals.

It's interesting to me that we are now addressing what is being called 'unforeseen consequences.' Anyone in the retrofit industry could have predicted the fall out that would result from title 24 enactments, in fact many people were. Who is asking what questions to assess industry impact? Not once in my career in the industry have I been engaged for feedback. Unfortunately title 24 policy as it relates to the retrofit market, apparently written in a bubble in this case, has stymied the very outcome it was designed to increase: energy savings.

New Light Energy Design 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. These outcomes would yield huge benefits to business owners and operators, contractors, manufacturers and distributors, program implementers and utilities across California.

Please feel free to contact me for further details,

Many Thanks,

Bret Walburg
415-312-5262
bret@newlighted.com