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ENERGY SERVICES

CALIFORNIA ENERGY COMMISSION
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California Energy Commission
DOCKETED
15-BSTD-01
TN 75472
MAR 19 2015

2016 BUILDING ENERGY EFFICIENCY STANDARDS

California Energy Commission DOCKET NO. 15-BSTD-01

To Whom it May Concern,

OpTerra Energy Services is one of the leading energy services companies in California, and lighting retrofits are a large part of the work we do for our customers. OpTerra ES endorses the opinion that current Title 24 requirements for interior and exterior lighting retrofits are onerous and counterproductive to efficiency improvement efforts. This is based on our actual experience. We endorse proposed language for interior retrofits that adds Exceptions for Alterations and Modifications such that Code is not triggered as long as the new or modified fixtures have at least 20 percent lower power usage compared to the original fixtures. We also support changes to the exterior code that adds an Exception for exterior fixture replacements such that Code is not triggered so long as replacement fixtures have at least 40 percent lower power usage compared to the original fixtures.

We ask that these changes be made effective immediately.

Sincerely,

Mark Emerson

Vice President