California Energy Commission
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February 24, 2015

CALIFORNIA ENERGY COMMISSION
Attention: Docket No. 15-BSTD-01
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814

Dear Sirs/Madams:

I am writing this letter to support the proposed changes by the CEC to the Title 24 Energy Efficiency Code to remove disincentives to the energy efficiency retrofit industry for carrying out energy retrofits. Since July 1, 2014 building code changes have added unnecessary complications to energy efficiency retrofit projects and added costs, to the point that it has made all but the smallest lighting efficiency upgrade opportunities (39 modifications or less) unrealistic for owners and occupants of existing California commercial facilities.

The proposed new 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 "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.

As sustainability manager for Oracle and a recipient of the Governor's Energy and Economic Leadership Award (GEELA), I support these proposed changes and encourage their passage and implementation.

Thank you.

Sincerely,

George Denise
Director of Operations, RWS & Director of Sustainability, HQ Region
LEED Accredited Professional
Oracle