RNM Engineering, Inc.
90 Baron Canyon Ranch Road
San Luis Obispo, CA 93401
www.RNM-Eng.com

Phone: 415-307-5106
Fax: 805-781-0816
RickMiller@RNM-Eng.com

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California Energy Commission
DOCKETED
15-BSTD-01
TN # 75485
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California Energy Commission
Dockets Unit
1516 Ninth Street, MS 4
Sacramento, CA 95814-5512

Re: Docket # 2014-BSTD-01 Proposed Revisions to 2016 Title 24, Part 6

I respectfully submit the following comments for revisions to the California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 6.

SECTION 130.4 –LIGHTING CONTROL ACCEPTANCE AND INSTALLATION CERTIFICATE REQUIREMENTS

Recommend interchanging paragraphs (a) and (b) because in the chronological sequence of a construction project Installation occurs prior to Acceptance. Furthermore, paragraph (c) regarding the CLCATT then logically follows paragraph (b) regarding Acceptance Testing.

(a~~b~~) **Lighting Control Installation Certificate Requirements**

(b~~a~~) **Lighting Control Acceptance Requirements.** Before an occupancy permit is granted ~~for a newly constructed building or area, or a new lighting system serving a building, area, or site is operated for normal use~~, indoor and outdoor lighting controls serving the building, area, or site shall be certified as meeting the Acceptance Requirements for Code Compliance in accordance with Section 130.4(a). A Certificate of Acceptance shall be submitted to the enforcement agency under Section 10-103(a) of Part 1, that:

Recommend deleting subparagraph 1 or substantially modifying it because the CLCATT is not responsible for the preparation of the plans and specifications. Regardless whether the plans and specifications mention the necessary testing, the CLCATT is still required to perform the acceptance testing in accordance with Section 10-103-A and Section 130.4.

1. Certifies that all of the lighting acceptance testing necessary to meet the requirements of Part 6 are included on the plans and specifications; ~~plans, specifications, installation certificates, and operating and maintenance information meet the requirements of Part 6~~.

(c) When certification is required by Title 24, Part 1, Section 10-103-A, the acceptance testing specified by Section 130.4 shall be performed by a Certified Lighting Controls Acceptance Test Technician (CLCATT). If the CLCATT is operating as an employee, the CLCATT shall be employed by a Certified Lighting Controls Acceptance Test Employer. The CLCATT shall disclose on the Certificate of Acceptance a valid CLCATT

certification identification number issued by an approved Acceptance Test Technician Certification Provider. The CLCATT shall complete all Certificate of Acceptance documentation in accordance with the applicable requirements in Section 10-103(a)4.

Thank you for your consideration of these comments.

Respectfully submitted,

Richard N Miller

Richard N. Miller, PE, LEED AP, IES, IAEI, IEEE, LC
President, RNM Engineering, Inc.