SF Environment
Our home. Our city. Our planet.
A Department of the City and County of San Francisco

Edwin M. Lee
Mayor

Deborah O. Raphael
Director

California Energy Commission
DOCKETED
15-BSTD-01
TN # 75566
MAR 30 2015

CALIFORNIA ENERGY COMMISSION
Attention: Docket No. 15-BSTD-01
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
Re: 2016 Building Standards Update; 14-BSTD-01 Rulemaking Comments

To Whom It May Concern:

The San Francisco Department of Environment supports the California Energy Commission's work to improve building energy performance through the 2016 Building Energy Efficiency Standards. As the only local government in California that has adopted local ordinances exceeding every one of the 2005, 2008, and 2013 Energy Standards, the City and County of San Francisco is strongly committed to energy efficiency and distributed renewable energy generation as tools for improving the environmental, economic, and social equity of the built environment.

SF Environment implements San Francisco Energy Watch, a local government partnership energy efficiency program. In our experience the 2013 Standards have been counter-productive for retrofit projects, and have substantially reduced the real energy savings achieved. Many San Francisco businesses and multifamily buildings considering lighting retrofits have decided against projects due to the additional work and cost required, since current state policy limits ratepayer investment to improvements beyond code. The vast majority of existing buildings are not planning renovations or alterations; under the 2008 Standards, ratepayers were able to provide the critical incentive to motivate improvements. The overly strict triggers for code compliance in the 2013 standards greatly curtailed the cost-effective savings beyond code. We have seen energy efficiency retrofits to existing buildings drastically curtailed.

SF Environment believes that the following proposed Exceptions to the code are critically important:

EXCEPTION 2 to Section 141.0(b)2I. "For work consisting of only luminaire replacements per ii above, where replacement luminaires have at least 20 percent lower power consumption compared to the original luminaires."

And

EXCEPTION 2 to Section 141.0(b)2J. "Replacement of luminaire components where the modified luminaires have at least 20 percent lower power consumption compared to the original luminaires."

The proposed changes and exceptions to Section 141.0(b)2 will allow our program and others across the State to accelerate energy efficiency retrofits in buildings where major alterations are not planned. This change is pragmatic, and supports continued delivery of real energy savings.

If you need additional information or clarification, please contact Kathleen Bryan, 415-355-3717, kathleen.bryan@sfgov.org.

Respectfully,

Deborah O. Raphael

Deborah O. Raphael, Director

Cc: James Zhan

San Francisco Department of the Environment
1455 Market Street, Suite 1200, San Francisco, CA 94103
Telephone: (415) 355-3700 • Fax: (415) 554-6393
Email: environment@sfgov.org • SFEnvironment.org

Printed on100% post-consumer recycled paper.