Stanford University

SUSTAINABILITY AND ENERGY MANAGEMENT

California Energy Commission
DOCKETED
15-BSTD-01
TN # 75439
MAR 17 2015

Date: March 17, 2015

To: California Energy Commission

Re: Title 24 (Docket No. 15-BSTD-01)

Dear Energy Commission Staff,

I am writing in support of the proposed Title 24 2016 language granting exemptions from code requirements in the case of one-for-one luminaire or luminaire component replacement where the new luminaires or components have at least twenty percent (20%) lower power consumption than the existing condition. I believe this will enable institutions such as Stanford University to continue group re-ballast programs interrupted by the onerous 2013 requirements for "luminaire modifications in place". Stanford's group re-ballast program has been a major source of lighting efficiency improvements over time as we are able to leverage both maintenance and energy-efficiency funding. It would be even more helpful if the proposed exemption could be applied under the current (2013) code so we do not lose two more years of progress and can maintain our working relationships with our vendors/partners in the group re-ballast program.

Thank you for the opportunity to comment.

Sincerely,

Gerry Hamilton, PE
Director – Facilities Energy Management
Department of Sustainability & Energy Management

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