

DOCKETED

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What is the CEC's justification for continuing Title 24 for lighting retrofits?

Dear Sirs and Madams

What is the CEC's justification for continuing Title 24 for lighting retrofits?

This is really important information for the CEC to provide, because without that, I cannot think of any valid reason for Title 24 for lighting retrofits.

After considerable research, I only see that considerably more energy would be saved without any Title 24 or at least with way lighting retrofits were generally done before July 1, 2014, which was basically if there was bilevel lighting the new lighting had to be at least checkerboarded and if more than 50% of the lighting fixtures were replaced a simple Title 24 permit was required. Without any Title 24, lighting professionals and end-customers would get well below Title 24's allowed WSF, would install controls where they are cost effective and would be able to keep up with the evolution of lighting and controls much better than Title 24's planning time and three year cycles. Without Title 24 for lighting retrofits there would be less of tax burden on California residents paying for CEC employees and paid consultants.

So, CEC please answer these ten questions.

1. What is your scientific and/or pragmatic rationale for wanting the modified 15 day language instead of having no Title 24 or going back to how lighting retrofits were generally done before July 1, 2014?
2. Do you think that the modified 15 day language will save more energy compared to no Title 24 or how lighting retrofits were generally done before July 1, 2014?
3. Do you think it is fair to penalize end-customers who have done good previous lighting retrofits and really cannot save 35% or 50% wattage in an upcoming retrofit while maintaining existing light levels, while gracing end-customers, who have kept inefficient lighting, by allowing them to use the streamlined Title 24 procedure?
4. Are you only willing to go with modified 15 day language, because if you went any further, you would have to accept the blame that you screwed-up the 2013 Title 24 for lighting retrofits, by approving too much input from Doug Avery, Jim Benya and others for dimming, controls, controls technicians, automatic demand response, etc.?
5. Why do you not allow sufficient wattage for sufficient light for non-visual or biologic part of the visual system, which could really help improve alertness, productivity, learning, etc.?
6. Why do you still want to mandate controls in applications that they are not cost effective, because people are doing a very good job manually turning off lights when they leave, people are doing a very good job manually turning off or dimming lights when sufficient daylight and/or today's LED products are so low wattage?
7. Since there are more and more projects with diminishing returns, why is the CEC mandating extra costs, which can kill those lighting retrofit projects?
8. Since the 2010 Title 24 was not broke, why did you try to fix it so much?

9. Did you want the California 2013 Title 24 to look better than ASHRAE and IBC, even though being stricter often saves less energy?

10. How do you feel about the lighting professionals you put out of work, the lighting companies that you drastically cut their business or put out of business, and the end-customers that you killed their lighting retrofit projects from July 1, 2014 to now, which is creeping close to two years, and the modified 15 day language will not sufficiently correct, while you and your consultants have been working and getting paid as usual?

If you cannot provide good answers, California should not have to be shackled by Title 24 at least for lighting retrofits.

Since the free market of lighting professionals and end-customers currently know so much about lighting, controls and cost effectiveness, without substantial good information from you, it sure looks like the Big Brother of CEC and its Title 24 for at least lighting retrofits causes more harm than good.

Thank you for your consideration.

Stan Walerczyk, CLEP, HCLS
Principal of lighting Wizards
808-344-9685
stan@lightingwizards.com