

## DOCKETED

<b>Docket Number:</b>	16-BSTD-01
<b>Project Title:</b>	2013 Compliance Option for Nonresidential Lighting Alterations
<b>TN #:</b>	210711
<b>Document Title:</b>	Stan Walerczyk Comments: Governor Brown, CPUC and others, we need your help
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Stan Walerczyk
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/14/2016 4:57:46 PM
<b>Docketed Date:</b>	3/14/2016

*Comment Received From: Stan Walerczyk*

*Submitted On: 3/14/2016*

*Docket Number: 16-BSTD-01*

## **Governor Brown, CPUC and others, we need your help**

Very few people and organizations accept full responsibility and vote themselves out.

It can easily be considered that the CEC totally screwed up lighting retrofits in the 2013 Title 24, by allowing Doug Avery and consultants to push for dimming, controls and ADR.

Soon after that Title 24 was approved Doug Avery and Owen Howlett left the CEC and Doug Avery retired from SCE. Why?

The 2010 and previous Title 24s worked very well for lighting retrofits, and the proven "Don't Fix It Unless It Is Broken" should have been heeded, but the CEC did not, even though several lighting retrofitters showed the CEC that dimming, controls and ADR would often not be cost effective.

The main reasons that there still is a lighting retrofit industry in California are several jurisdictions do not bother with this Title 24, several lighting retrofitters avoid Title 24, utilities not wanting to be code cops, Title 24 does not apply to federal buildings on federal property, which includes Indian casinos and military bases and Prop 39 funds.

It sure seems that the CEC does not want to do what is optimal for lighting retrofits, which could be considered that it totally screwed up the 2013 Title 24.

It sure seems that the CEC is only willing to go with a modified version of the 15 day language for lighting retrofits, because that can improve lighting retrofits some what, while not showing that the CEC totally screwed up lighting retrofits in the 2013 Title 24.

But this 15 day language is really not optimal especially after the existing Title 24 has been so bad since it took effect on July 1, 2014, which is getting close to two years, and this 15 day language could be in effect in the 2016 Title 24, which may be from January 1, 2017 through December 31, 2019.

For example, if the CEC will go with the unfair 35%/50% rule, that will grace end-customers, who have kept inefficient lighting and penalize end-customers, who have done good previous retrofits, because in offices and some other applications, they will not be able to save 50% in re-retrofits, so they will have to use the expensive version of Title 24.

Since the CEC does not seem to take full responsibility for the existing screw up, because that may make it easier for lawsuits against them, may reduce their funding and may lead to some people at the CED getting fired, why should the CEC be allowed to continue making decisions about Title 24?

Here is a link to an interview with California Commissioner Andrew McAllister. To me this and SB 350 are more Ivory Tower and Big Brother effort, when the free market can do much better. What right does the California government have to mandate citizens to make their own systems more efficient? I firmly believe that people should have the right to make their own decisions and will probably do it when cost effective. What do you think?  
<http://gettingtozeroforum.org/mcallister-interview/>

So Governor Jerry Brown, the CPUC and others, especially non-governmental ones, need to step up and allow the

free market to make lighting retrofits optimal again, like it was before July 1, 2014.

Title 24 does not help save energy in lighting retrofits, and even with 15 day language, it will continue to be an obstacle. The free market gets very low LPD with or without Title 24. The free market installs controls when they are cost effective.

The free market understands the benefits of Human Centric Lighting, even though the CEC has not shown any grasp of it.

I ask the real lighting retrofitters, end-users and other stakeholders to contact the governor, CPUC and others, especially nongovernmental ones.

Thank you for your consideration, Stan

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