

## DOCKETED

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*Comment Received From: Stan Walerczyk*

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## **Does the CEC want to take responsibility for limiting lighting retrofits through 2019?**

Dear Sirs and Madams

Does the CEC want to take responsibility for limiting lighting retrofits through 2019?

It is bad enough that the CEC decimated the lighting retrofits during the 2013 Title 24 so far, which is most of its duration, and that would have been worse, except for:

Numerous lighting retrofitters avoiding Title 24

Several jurisdictions not abiding by Title 24 for lighting retrofits

Title 24 does not include federal buildings on their property

Title 24 does not include laboratories and other selected types of facilities

Utilities not wanting to be code cops

PG&E's Lighting Design Assistance program, which directly pays approved lighting designers and provides extra rebates for various LPD's below .5 WSF

Prop 39's funding

Free market's creativity to get around Title 24's roadblocks

CEC accidentally allowing TLEDs with existing ballasts not to trigger code and that has become a major retrofit strategy

This Title 24 has really hurt typical tax paying end-customers, who want to do lighting retrofits, but cannot, because with the extra costs and restrictions, those projects do not meet their financial requirements, which are often two or three year paybacks.

15 day language will not be sufficient for the rest of the current Title 24 and for the 2016 version, which runs through the end of 2019.

So does the CEC want to take responsibility for shackling lighting retrofits for the next three and a half years?

Allowing nothing more than 15 day language through 2019 will limit:

Lighting retrofits

Energy savings

Lighting professionals' jobs and income

Lighting companies' profits

Substantial benefits of Human Centric Lighting

As I have stated in numerous other letters it would be best for the people and the State of California if the CEC discontinued Title 24 for lighting retrofits or at least went back to how lighting retrofits were generally done before July 1, 2014.

CEC, please accept that you totally screwed up the 2013 Title 24 and allow for optimal lighting retrofits by getting out the way and allow the free market to adapt to ever changing developments and install controls when cost effective.

15 day language is half baked and at least the 35%/50% part is unfair to end-customers, who have done previous

retrofits and want to do re-retrofits.

Lastly, as I have asked several previous times, what right does the CEC have to mandate how anybody should retrofit their own lighting?

Stan

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