

## DOCKETED

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*Comment Received From: Stan Walerczyk*

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## **Just Because Kilolumen Rebates Are Working Well**

*Additional submitted attachment is included below.*

April 3, 2016

Dear Sirs and Madams

**Just Because Kilolumen Rebates Are Working Well...**

Historically rebates, including fixed amount and customized ones, typically covered 20 – 25% of the lighting retrofit project costs, which worked quite well before diminishing returns, Title 24 permit costs, and IBEW cancelling light fixture maintenance category.

Recently both PG&E and SCE offered kilolumen rebates on LED troffers and troffer kits. Rebates are increased with higher lumens up to 6500 and higher efficiency up to 125+ LPW. Rebate = lumens/1000 x up to \$30 multiplier. PG&E's rebate is up to \$195, and SCE's rebate is up to \$130.

Especially the up to \$195 rebate can cover the cost of the troffer or troffer kit, controls to limit lumens and wattage and maybe also occupancy sensors and photocontrols, and maybe also some labor and Title 24 requirements.

The maximum rebate cannot exceed troffer or troffer kit cost, but the lighting vendor can charge the end-customer up to \$195 troffer or troffer kit price and basically provide controls and maybe at least some labor and Title 24 hurdles at reduced or no cost.

These kilolumen rebates have really started and will continue to really help lighting retrofits.

But the CEC should take no credit for increase in current and upcoming lighting retrofits, because Title 24, even with 15-day language, is terrible.

These kilolumen rebates may not have been necessary if it was not for Title 24.

Plus if PG&E and/or SCE reduce or drop their rebates, lighting retrofits should take a big hit, even with Title 24's 15-day language.

Stan

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