

DOCKETED

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Nonresidential Lighting Alterations Alternatives for Demonstrating Compliance with the Existing 2013 Standards - part 2

Dear Sirs and Madams

Following are several more points regarding improving energy savings from lighting retrofits.

If it was not for the following reasons, the lighting retrofit industry in California would be more decimated:

TLEDs with existing ballasts do not trigger code.

Federal and Indian buildings on their land are not applicable for Title 24.

Prisons, laboratories and other facilities are not applicable for Title 24.

Prop 39 funds for schools, etc.

Task light wattage is not included if less than .3 watts per square foot (WSF)

It is my understanding that utilities do not want to be code cops.

Some jurisdictions do not bother with Title 24 for lighting retrofits.

Some retrofit contractors bypass Title 24.

The PG&E up to \$195 rebate for LED troffers and troffer kits.

It is my professional opinion that TLEDs with existing ballasts do not trigger code because the CEC focused on dimming and controls, and did not realize that TLEDs with existing ballasts would become so popular. The CEC has pushed people toward TLEDs with existing ballasts, even if that that is often not the best technology solution. The IBEW cancelling light fixture maintenance category and requiring the much more expensive inside wireman category has pushed TLEDs even more, because they are fast to install.

If the main purpose is to save energy from lighting retrofits, the CEC has totally failed with the 2013 Title 24 compared to before. The modified 15 day language will help somewhat, but it will be no where close to optimal.

If the main purpose is to save energy from lighting retrofits, it would be best to have Title 24 or to go back how retrofits were generally handled in the 2010 version or have no Title 24.

With how fast lighting and controls are evolving the planning time and three year Title 24 are no longer workable. Now that most lighting professionals and many end-customers have a quite good knowledge of lighting and products, let the free market decide, because the free market can do much better without being shackled by Title 24.

The free market would achieve very low power densities would be achieved without Title 24's maximum WSF's. For example in offices, I am seeing a lot of .20 - .35 WSF from ambient lighting.

If anybody at the CEC working on lighting retrofits in Title 24 can justify their salaries, which come from California taxes, please let the world know.

I invite all including from CALCTP, CEC, IBEW, NECA and NEMA to two upcoming seminars.

Best Lighting Retrofit Solutions " Including Title 24 Requirements at SDGE's Energy Innovation Center on March 1

Are Controls Cost Effective With LEDs? at Strategies In Light in Santa Clara on March 2

I am writing two white papers, which should be finished in about a week, and for those who would like to read them for free, please email me at stan@lightingwizards.com.

When Are Lighting Controls Cost Effective?

How To Retrofit Or Replace Linear Fluorescent Fixtures?

If anybody thinks they can find significant flaws in my presentations or white papers, please make that publicly known.

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