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Comment Received From: Christopher Buck

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Comments on Nonr

Additional submitted attachment is included below.



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California Energy Commission
Dockets Office, MS-4
Re: Docket No. 16-BSTD-02
1516 Ninth Street
Sacramento, CA 95814-5512

March 10, 2016

Comments on Nonresidential Lighting Alteration Enforcement, 2016 Title 24 Part 6

I'm writing you as the Product Manager at Digital Lumens, an intelligent lighting manufacturer that has installed advanced lighting controls in over 300 Million square feet of commercial and industrial buildings across 45 countries. By the end of 2016 we will have saved our customers over 2 billion kWh.

I'm writing to comment on the enforcement of the 2016 Title 24 lighting alteration and modification requirements. With the implementation of certified acceptance testers and required advanced controls in the 2013 code we have seen a noticeable increase in awareness and employment of advanced lighting controls providing drastic savings to our customers.

Unfortunately, the new Title 24 advanced lighting control exemption based on power reduction is not going to be enforceable as written and wouldn't be subject to acceptance test requirements. Without third party verification the contractors and property owners will have a strong financial incentive to embellish the amount of savings achieved in order to avoid triggering the code requirements.

Ideally, inspections would occur prior to the job including a careful review of the existing and proposed lighting installation. This could be accomplished by one of the many trained acceptance testers that are already present in the system.

We believe that without these steps California will miss out on vast energy savings undermining state goals to the contrary.

Regards,

A handwritten signature in black ink, appearing to read 'Christopher Buck', written in a cursive style.

Christopher Buck
Digital Lumens