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| <b>Docket Number:</b>   | 16-BSTD-02  |
| <b>Project Title:</b>   | 2016 Nonresidential Lighting Alteration Enforcement   |
| <b>TN #:</b>            | 210703  |
| <b>Document Title:</b>  | CALCTP Comments on 2016 Lighting Alternation Chapters in the Nonresidential Compliance Manual |
| <b>Description:</b>     | N/A   |
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| <b>Organization:</b>    | The California Advanced Lighting Controls Training Program (CALCTP)/Mark Ouellette            |
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*Comment Received From: Mark Ouellette*

*Submitted On: 3/14/2016*

*Docket Number: 16-BSTD-02*

**Comments on 2016 Lighting Alternation Chapters in the Nonresidential Compliance Manual**

*Additional submitted attachment is included below.*



## The California Advanced Lighting Controls Training Program CALCTP

March 14, 2016

California Energy Commission

Dockets Office, MS-4

Re: Docket No. 16-BSTD-02

1516 Ninth Street

Sacramento, CA 95814-5512

<https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=16-BSTD-02>

Re: Docket No. 16-BSTD-02 - Lighting Alteration Enforcement

Dear Commissioner McAllister and Commission staff:

The California Advanced Lighting Controls Training Program (“CALCTP”) understands that the Commission is currently considering enforcement options for the new 2016 Title 24 lighting alteration and modification compliance option that allows altered or modified systems to avoid installation of certain advanced lighting controls if the lighting system’s overall power consumption is reduced by 50% for retail, commercial or office occupancies, or 35% for all other occupancies (“35/50% compliance path”). I have been asked to inform Commission staff that CALCTP has been authorized by its leadership to develop an acceptance test and acceptance test form to verify the power reduction achieved when a lighting alteration or modification project chooses the 35/50% compliance path (“the CALCTP 35/50% compliance pathway acceptance test”).

This will be an optional, acceptance test that is not required under current California Energy Commission regulations, but that will be available for local building officials looking for ways to effectively verify compliance. CALCTP expects that its certified Acceptance Test Technicians will be trained in this new optional acceptance test by the time this pathway becomes effective on January 1, 2017. Training will be provided through a training webinar that will be included with the 2016 Title 24 update training that its technicians are required to complete. CALCTP has determined that the scope of this acceptance test would not require hands-on class-room training.

This CALCTP acceptance test is being created in response to concerns by local building inspectors that they would be unable to verify compliance with Title 24 requirements when contractors choose this option since the original lamps and ballasts would be gone before a building inspector inspected the work. The CALCTP 35/50% compliance pathway acceptance test verifies compliance through both pre-installation and post-installation on-site visual inspections of the project. The Acceptance Test Technician will verify the power consumption of the original and replacement lamps and ballasts and verify the power consumption savings calculations.

Because the CALCTP 35/50% compliance pathway acceptance test is not currently required under Title 24 regulations, this training module is not included in the CALCTP 2016 Title 24 Lighting Control Acceptance Test training update package that is being provided to Commission staff for

review and approval. Should the Commission adopt mandatory acceptance test verification requirements, CALCTP will provide the training module to Commission staff for approval.

Sincerely,

Mark Ouellette  
CALCTP Administrator