

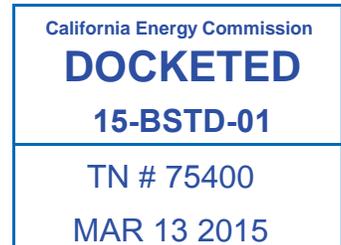
Energy - Docket Optical System

From: Ownby, Adrian@Energy
Sent: Friday, March 13, 2015 11:19 AM
To: Energy - Docket Optical System
Cc: Shirakh, Maziar@Energy; Strait, Peter@Energy; Geiszler, Eurlyne@Energy
Subject: FW: Docket No. 15-BSTD- 01

Docket Unit – Please add the email below to Docket #15-BSTD-01. Thanks.

-Adrian

Adrian Ownby
Energy Specialist
Efficiency Division
California Energy Commission
(916) 651-3008



From: Dennis Cohen [<mailto:dennis@americanlighting.net>]
Sent: Friday, March 13, 2015 9:43 AM
To: Ownby, Adrian@Energy
Subject: Docket No. 15-BSTD- 01

Dear Sirs,

In reference to possible changes in the Title 24 Energy Efficiency Code and Standards I fully support the proposed changes.

I am the Senior Vice President of Sales for American Lighting and have enjoyed 32 years of my life in the lighting industry. As a manager of sales reps I interact with customers each and every day. I can tell you with full confidence that we have proposed over 100 interior projects since the inception of the new Title 24 rules and not one of them has closed. Most customers have informed us that until these rules are relaxed they will either find a contractor who is willing to circumvent the Title 24 rules, or seek out projects with less bureaucratic hurdles. Since our sales reps are paid commission on sold projects their livelihood has been severely sacrificed as a direct result of the decision to implement the new standards. We are now faced with less reps and will have to re-train new employees if and when their earning barriers are removed. Therefore, even if you relaxed the standards to exempt retrofits today much of the damage is done and it will take months, if not years to remedy. Time is of the essence in order to preserve our remaining reps.

Interior lighting project costs have doubled if not tripped, while the resulting energy savings has only increase slightly with these new standards. The resulting paybacks have more than exceeded any of our customer's thresholds. Paybacks for LED projects had finally become reasonable until Title 24 changed. Prior to July 1, 2014 approximately 80% of our projects were for interior lighting retrofits. Today most of the work that we are performing is for exterior lighting. Even those projects are slim, with surviving contractors inundating the limited prospects. We cannot wait much longer for

you to adopt the revised standards. Fortunately with our 29 years of business and our tenured management we have creatively been able to keep the company alive.....for now.

The rules for exterior lighting are viewed as unreasonable and not well thought out as well. Most exterior lighting applications are there for security reasons. Customers want the areas fully illuminated, even if there is no human presence. They simply want their lots to be secure. Although step dimming exterior lighting when the area is unoccupied seems to make energy sense, that is hard to explain to someone who has to walk into a dark abyss at night. Many of our exterior customers want their lots to be better lit. When we advise them that Title 24 requires them to dim their lights when there is no motion they are shocked that someone would make them potentially liable in a law suit. People sue for some crazy reasons. Intentionally putting someone at risk as a result of poor regulatory actions is ripe for a law suit.

I feel that I owe it to my sales reps to voice our concerns and ask for your consideration.

Sincerely,

Dennis Cohen

Senior Vice President

American Lighting

6861 Nancy Ridge Drive

San Diego, CA 92121

Office: 800-973-8763 Ext. 315

Cell: 760-419-3757

www.americanlighting.net