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February 6, 2008

Mr. Gary Flamm
California energy Commission
Docket Office
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Ref: Docket Number 07-BSTD-1 as Submitted by NEMA

Dear Mr. Flamm,

Recently we were made aware of comments made by NEMA in a letter submitted to the CEC on December 14th 2007. Sensor Switch is a relatively new member of NEMA and does not share all of the same views as NEMA concerning the controls, and a letter submitted to your office from Jon Null of The Watt Stopper company (attached for reference).

In general Sensor Switch concurs with the comments made by Mr. Null. We agree that Section 119(f)(1) which calls out two thirds reduction allows for better controllability of the space by having four levels of lighting: off, 1/3rd, 2/3rd, or full on. In addition to Mr. Nulls comments, this allows for multiple "step dimming" of the space, and is much more desirable for the user and hence more likely to be an effective conservation measure. A 50% only system does not lend itself near as well to reducing light levels when not needed.

We also agree with Mr. Null's assessment of Section 131 (d) 4. In (a) Mr. Null points out that Sensors are easily integrated in Scene controls, and is essential in making sure the lights are turned off. Section C seems to broad and should be redefined or eliminated. The NEC covers this type of condition already and may not be needed in the energy code. Most importantly however is the section (e) School buildings containing classrooms for any of grades K-8. We strongly recommend the use of Sensors in this application. Given that every room also has a manual switch, and the sensors do not extinguish the lights for a time delay period after the room is vacated, there still remains the potential to have the students manually turn off the lights when they leave, if that situation even exists.

We encourage the CEC to support the recommendations of The Watt Stopper on these matters. If you have any questions of us, please contact me directly.

Sincerely,
Brian Platner
President