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California Energy Commission
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California Energy Commission
Attention Docket No. 15-BSTD-01
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814

Subject: 2016 Building Energy Efficiency Standards, Section 141.0
Proposed Lighting Retrofit Requirements in the 2016
Title 24 Standards Docket No. 15-BSTD-01

The Los Angeles Department of Water and Power (LADWP) appreciates this opportunity to file written comments regarding the 2016 Building Energy Efficiency Standards, Section 141.0, "Proposed Lighting Retrofit Requirements in the 2016 Title 24 Standards", Docket No. 15-BSTD-01.

The 2013 Building Energy Efficiency Standards, which went into effect on July 1, 2014, introduced requirements to retrofit advanced lighting controls and pin-based sockets for screw-in CFLs when forty or more lighting fixtures (luminaires) in a single space or facility are modified. These enhanced requirements were put in place to push the lighting retrofit industry towards deeper, more comprehensive energy efficiency savings, and LADWP strongly supports this direction for the industry.

Since early 2015 CEC staff and various interested stakeholders including LADWP have been working on the next generation of lighting retrofit requirements for the 2016 Title 24 Standards. A number of stakeholders in the process have voiced concerns about the advanced controls requirements and their effect on the larger lighting retrofit industry in California. LADWP understands these concerns and agrees that elements of the 2013 Standards pertaining to the advanced lighting controls requirements are ambiguous or unclear and will benefit from clarification in the 2016 Standards language.

However, LADWP opposes several provisions in the current 15-day language that weaken the spirit and intent of the 2013 Standards to promote advanced controls and pin-based CFL socket adoption. Specifically, LADWP opposes raising the trigger for advanced controls from 40 modified fixtures to 70. Additionally, LADWP opposes the alternative compliance method of exempting from the advanced controls requirements

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projects which achieve a 30 percent or more reduction in installed lighting power density in the altered space. On the latter point LADWP believes this provision to be unenforceable in practice by building departments due to project timing issues and resource availability for extra site inspections and the necessary verification calculations.

LADWP believes that technological solutions to stakeholder concerns regarding the costs of meeting the advanced lighting controls requirements in retrofit projects have matured to the point of commercialization. Specifically, a number of LED tube swap products, compatible with existing T12 and T8 fluorescent fixtures and ballasts, have entered the market. These products allow commercial customers to re-lamp a fluorescent lighting fixture from fluorescent tubes to LED tubes without modifying the fixture or removing ballasts. Thus, such an LED retrofit can be conducted simply as a maintenance operation.

LADWP is currently incorporating this technology into our Small Business Direct Install Program (SBDI), which performs lighting upgrades free of charge for small businesses in our service territory. Previously we were truncating our SBDI projects after 39 luminaire modifications in place, in order to avoid triggering the advanced controls and pin-based CFL socket retrofit requirements which are not cost effective under a 100% ratepayer-funded direct install program model. However, with the new LED tubes that are compatible with existing T12 and T8 fluorescent fixtures and ballasts, LADWP can now cost effectively complete the lighting retrofits for these customers. LADWP plans to continue to completely replace the first 39 fixtures on our SBDI lighting retrofit projects, and then employ the new LED tube swap products to complete the projects in order to maximize our customers' energy efficiency opportunities while maintaining a cost effective program for our ratepayers.

LADWP is concerned that the current 15-day language, as currently being considered for adoption:

- Threatens to derail the 2013 T24 code's intent to transform the lighting retrofit industry through a focus on advanced controls
- Will be administratively difficult for building department staff to enforce

LADWP encourages the CEC Commissioners to reject any changes to the lighting control requirements that weaken the spirit and intent of the advanced lighting controls requirements in the 2013 Standards. Specifically, LADWP recommends retention of the 40 fixture trigger for advanced lighting controls and pin-based CFL socket retrofit, as well as elimination of the exemption for systems with at least a 30 percent reduction in installed lighting power density from the advanced controls requirements.

LADWP believes that's the newly commercialized LED tube swap products now available in the market will resolve the stakeholder issues that led to these compromises to the Standards and now renders them unnecessary. In fact, incorporating such compromises into the Standards now unnecessarily takes the Standards backwards rather than forwards in regards to the State's nation-leading position in energy efficiency and greenhouse gas emissions reductions.

If you have any questions on these comments, please contact Mr. Mehdi Shafaghi at (213) 367-3974 or Mr. James Kemper at (213) 367-5095. Thank you for your consideration.

Sincerely,

David Jacot
Director of Efficiency Solutions

JK:srt
c: Mr. Mehdi Shafaghi
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