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CONTROLLED ENERGY
Energy Efficient Lighting & Controls

California Energy Commission
DOCKETED
15-BSTD-01
TN # 75231
MAR 02 2015

February 28, 2015

TO: The California Energy Commission

ATTENTION: **Docket No. 15-BSTD-01**

I am writing to state **our support for the proposed changes to Part 6, Section 141.0**, that will simplify energy efficiency retrofits to existing lighting systems.

We have been in the business of energy efficiency lighting retrofits since 1985 when the industry was in its infancy. Never, since that time, have we seen the marketplace stall in the way it has during 2014 and 2015 after the introduction of the most recent Title 24 requirements. Those requirements have increased the costs and complexity of the simple efficiency retrofits that were once common and a no-brainer decision. Today, given the need for meeting a bevy of expensive and complex upgrades in order to replace inefficient lighting equipment, many potential customers have decided to do nothing. The effects on both our business, and more important, energy efficiency in general, have been devastating.

During 2014, we laid off 80% of our lighting technicians and saw business decrease by a whopping 80% as well. Never in the last 30 years in this industry, have we seen a decrease of this magnitude, even during the disastrous California Public Utilities Commission experiment with Standard Performance Contracting from 1999-2001. (That interruption in the marketplace resulted in a 60% reduction in energy efficiency sales and the elimination of most of the vendors who performed the energy efficiency work.) We have witnessed a similar elimination of vendors and suppliers during the current marketplace stall.

We are a contracting firm and can speak about the effects on our business. We can also speak about the effects on related businesses in the energy efficiency industry. Our suppliers have been affected as well. Instead of purchasing pallets of ballasts and lamps each month, we are purchasing a few boxes of each for the very small lighting retrofit projects that are exempt from the 2014 Title 24 regulations. The lighting auditors that we used to employ to specify projects are also not seeing any business from us. The recycling companies that we use to recycle the used lamps and ballasts removed in the retrofits are also not seeing much business from us these days. Many of these providers will leave the field and not return if the current situation continues. That was the case in the earlier marketplace disruption, and we can see the same pattern in this one.

We suggest that you examine the Public Purpose Funds collected by the Investor Owned Utilities to fund the incentives and rebates for energy efficiency upgrades. Our own queries have established that these funds are accumulating and not being requested by individuals and businesses for efficiency upgrades. Everything is related and connected. The mistake made in the 2014 Title 24 requirements for lighting has rippled through all of the related parts of our industry. None is functioning as before, and the marketplace as a whole is dead in the water.

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The CEC took a robust efficiency industry that has allowed California to grow without adding new electrical generating capacity, and tried to "fix" it. Instead, it has nearly killed it off, and may never see it as robust or effective again. After the Standard Performance Contracting error in the late 1990s and early years of this century, the lighting efficiency industry was not as dynamic as it had been during its heyday in the 1990s. Vendors disappeared and did not return, and incentive programs were not as effective at encouraging the widespread upgrades in the commercial marketplace as before.

Again, we support the proposed changes to Part 6, Section 141.0 and **we urge the CEC to make them effective on July 1, 2015 or sooner** so that some life can be put back into the lighting efficiency industry sooner rather than later. In that way, some of the damage already done can be undone, and greater damage the longer the restrictive regulations of the current Title 24 continue can be avoided.

Our industry and energy efficiency benefits from lighting efficiency upgrades are on the ropes. The CEC put them there, and can remedy the situation by correcting its mistake.

Sincerely,

Don Link

Don Link, President