



KYLE PITSOR

Vice President, Government Relations

May 7, 2018

Online via: <https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=17-BSTD-02>

Mr. Payam Bozorgchami
California Energy Commission
Dockets Office, MS-4
Re: Docket No. 17-BSTD-02
1516 Ninth Street
Sacramento, CA 95814-5512

NEMA Comments on CEC Title 24 15-Day Language Docket 17-BSTD-02

Dear Mr. Bozorgchami,

As the leading trade association representing the manufacturers of electrical and medical imaging equipment, the National Electrical Manufacturers Association (NEMA) provides the attached comments in response to CEC Title 24 15-day language issued April 20, 2018. These comments are submitted on behalf of NEMA Lighting Systems Division Member companies.

The National Electrical Manufacturers Association (NEMA) represents nearly 350 electrical equipment and medical imaging manufacturers that make safe, reliable, and efficient products and systems. Our combined industries account for 360,000 American jobs in more than 7,000 facilities covering every state. Our industry produces \$106 billion shipments of electrical equipment and medical imaging technologies per year with \$36 billion exports. Please find our detailed comments attached.

Our Member companies count on your careful consideration and we look forward to an outcome that meets their expectations. If you have any questions on these comments, please contact Alex Boesenberg of NEMA at 703-841-3268 or alex.boesenberg@nema.org.

Sincerely,

A handwritten signature in black ink that reads "Kyle Pitsor". The signature is written in a cursive, flowing style.

Kyle Pitsor
Vice President, Government Relations

NEMA Response to Comments on Title 24 15-Day Language

The Members of the National Electrical Manufacturers Association Lighting Systems Division commend the California Energy Commission on its recently adopted revisions to the Title 24 Building Energy Efficiency Regulations. This proceeding, which began almost two years ago, was marked by a new and innovative collaborative environment for the development of Title 24 regulations. This approach resulted in more accurate data and facts that informed the Commission and in improved 45- and 15-day express terms.

NEMA notes that the Commission incorporated several NEMA comments to the 45-day Express Terms into 15-day language. A selection of specific concerns and comments follow:

1. Section 110.9 Mandatory Requirements for Lighting Controls: We support moving the Title 20 lighting controls requirements for self-contained lighting controls into section 110.9 **provided** that the requirements are removed from Title 20 so that there are no inconsistencies.
2. Section 110.12(a)2: As expressed in our comments to 45-day language¹ NEMA disagrees with the over-specific nature of the proposed language. NEMA position is that as long as the demand responsive controls can talk to an OpenADR Virtual End Node (VEN) or incorporate an OpenADR VEN, they should be allowed to communicate with the rest of the lighting system using any protocol downstream of the VEN.
NEMA Proposal: Strike line 110.12(a)2
3. Section 130.0(c) Luminaire classification and power: NEMA agrees with the clarifications made to this section
4. Section 130.1(f) Control Interactions: NEMA agrees with the clarifications made to this section
5. Section 141.0(b)2I Altered Indoor Lighting Systems: NEMA supports the effort made by staff and stakeholders to simplify and clarify lighting control requirements for alterations while increasing energy efficiency by bringing back key provisions for energy saving lighting controls.
6. Section 150.0(k)2I Interior Lighting Switching Devices and Controls: the added text “using the manual control required under Section 150.0(k)2C” can be misleading. It can be interpreted to mean that the sensor configuration must be done by the manual control, when the sensor itself could also be the manual control. The **phrase** should be struck, or a clarification added to the Title 24 Compliance Manual to aid interpretation.
7. NEMA **reiterates** our recommendation that NEMA Standard 77² be incorporated into the 15-day language. NEMA Standard 77 is an effective, data-driven, accurate test and metric for LED Flicker, and its increasing voluntary use across the broad spectrum of scientists and industry continues to bear out our position. We will work with Commission staff to further demonstrate the value of NEMA 77 with the goal of inclusion into Title 24.

¹ <http://www.nema.org/Policy/Documents/NEMA-Comments-CEC-T24-45Day.pdf>

² <http://www.nema.org/Policy/Documents/NEMA-Comments-CEC-T24-NEMA-77.pdf>