



**TITLE 24, PART 6**

**2025 CODE CYCLE**



# Revise Automatic Daylighting Controls Exceptions

Codes and Standards Enhancement (CASE) Proposal  
Nonresidential Daylighting



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A STATEWIDE UTILITY PROGRAM

# Agenda

Background *2 min*

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Market Overview and Analysis *2 min*

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Technical Feasibility *2 min*

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Cost and Energy Methodology *7 min*

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Compliance and Enforcement *5 min*

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Proposed Code Changes *2 min*

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Discussion & Next Steps *15 min*





# Background

- Code Change Proposal
- 2022 Code Requirements
- Context and History

# Proposed Code Change

## Description of change:

- Reduce the total installed general lighting wattage for requiring automatic daylighting controls from 120 watts to 75 watts.

**Draft code language for this measure is available in Handouts.**



# Current Code Requirements

## Existing Requirements in Title 24, Part 6

- Section 130.1(d) exempts rooms from requiring automatic daylighting controls if:
  - The combined general lighting wattage in the skylit and primary sidelit zones is less than 120 watts.
  - The general lighting wattage in the secondary sidelit zones is less than 120 watts.

## Existing Model Code Requirements

- ASHRAE 90.1-2019 Addendum O revised the wattage for exempting automatic daylighting controls to 75 watts.



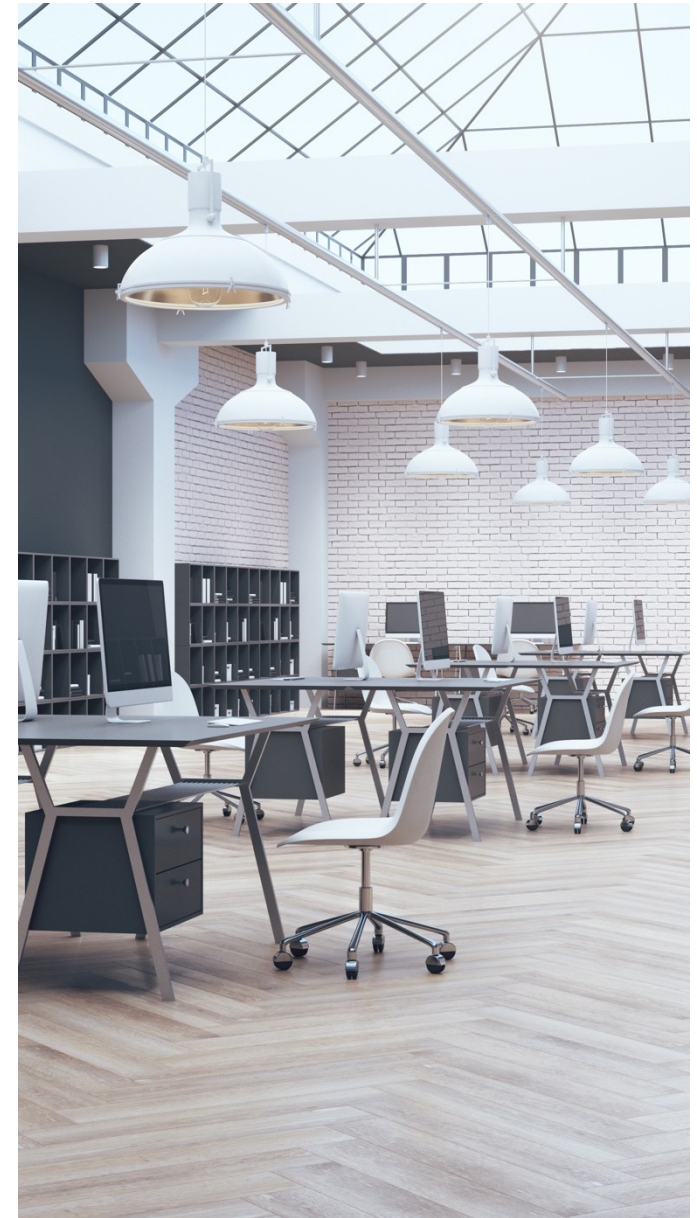
# Context and History

The 120-watt threshold for automatic daylighting controls has remained unchanged for multiple code cycles. Meanwhile, **luminous efficacy** of light sources has significantly increased.

- Title 24, Part 6 indoor lighting power densities are now based on LED efficacy.
- 120-watt threshold represents higher lighting power for LEDs compared to legacy technology.

LEDs have lowered dimming control costs:

- Dimming is a standard feature for general lighting luminaires with negligible added costs.
- Dimming to 10% is a standard feature.





# Market Overview

- Current Market Conditions
- Market Trends
- Potential Market Barriers and Solutions

# Market Overview and Analysis

## Current Market of Automatic Daylighting Controls

- Control strategy familiar to all market actors
- Standard capability in lighting control systems

## Market Trends

- Most LED luminaires are dimmable and can readily support automatic daylighting controls regardless of space size
- Connected lighting controls have reduced the complexity of implementing automatic daylighting controls

**Are you aware of market barriers we should consider?**

**POLL QUESTION NEXT  
SLIDE**





# Technical Considerations

- Technical Considerations
- Potential Barriers and Solutions

# Technical Considerations

## Technical Considerations

- Multiple options for implementing automatic daylighting controls in smaller spaces
  - Standalone daylight sensor
  - Daylight sensors as part of a room-based or building-wide networked lighting control system
  - Luminaire-level lighting controls that include a daylight sensor
- Both wired and wireless control solutions are available.

**POLL QUESTION NEXT  
SLIDE**

**Do you see any technical barriers we should consider?**

# Energy and Cost Impacts Per Square Foot

## *Methodology and Assumptions*

- Energy Savings Methodology and Results
- Cost Impacts Methodology and Results
  - Incremental costs
  - Energy cost savings



# Methodology for Energy Impacts Analysis

Based on a representative prototypical space:

- Square footage and configuration most likely impacted by the proposed code change
- Use ray tracing to determine the amount of daylight entering the space on an hourly basis
  - Estimate the frequency and depth of electric light dimming to maintain design light levels
  - Analyzing CZ1 - CZ16 and 4 orientations for primary and secondary sidelit daylit zones
- Compare energy usage between spaces with and without automatic daylighting controls

Ray Tracing Prototype	
Dimensions	16' x 18' (288 sqft)
Ceiling height	9'
Reflectances (ceiling, walls, floor)	80/50/20
Window size	3 side-by-side windows each 3'-6" wide by 5'-6" tall
Sill height	2'-6"
Window head height	8'
Lighting power allowance	0.6 W/sqft

# Assumptions for Standard and Proposed Designs



## Standard Design

- Compliant with 2022 code
- Daylighting controls in all zones **except:**
  - Combined general lighting in skylit and primary sidelit zones is less than **120** watts per room
  - Combined general lighting in secondary sidelit zones is less than **120** watts per room



## Proposed Design

- Dimming to 10% for all sources
- Daylighting controls in all zones **except:**
  - Combined general lighting in skylit and primary sidelit zones is less than **75** watts per room
  - Combined general lighting in secondary sidelit zones is less than **75** watts per room

# Which Space Types Could Be Affected?

## Spaces likely to be affected:

- Large private office > 250 sf
- Small classrooms, sidelit width 12 to 20 ft
- Corridors between 175 and 300 sf
- Lounges and conference rooms
- Small lobbies
- Small open offices < 25 ft daylight zone width
- Exercise rooms
- Small banks and other small to medium sized service

## Spaces unlikely to be affected:

- Small offices daylight zone width < 15 ft
- Standard size classroom, 20-30 ft sidelit
- Warehouses
- Toplit retail
- Open offices
- Atria, Concourses

# Incremental Cost Information

- Equipment costs are collected by obtaining quotes from manufacturer's sales representative agencies based on representative projects.
  - State and local sales taxes are applied to the material costs.
  - Representative projects include new constructions/additions and alterations
- Incremental labor costs are collected through market actor outreach, including
  - Specifier hours
  - Installation hours
  - Startup and commissioning efforts
- No additional costs for Acceptance Test Technicians due to sampling requirements and alterations options



## Poll

**What other important cost information should we consider?**



# Statewide Energy Impacts

## *Methodology and Assumptions*

- Statewide Energy Impacts Methodology



# Statewide Energy Impacts Methodology and Assumptions

The Statewide CASE Team estimates annual statewide impacts by multiplying **A x B x C**:

- A. per square foot energy impacts (discussed in previous section)
- B. number of square feet of new construction/additions/alterations of each applicable building type
  - Assumption: impacts all new construction
  - Assumption: existing buildings retrofitted once every 15 years
- C. portion of affected square feet in each climate zone

## Example:

Per Unit Impacts		X	Affected New Construction			=	Statewide Energy Impacts			
Savings type	Savings per sq ft		Climate Zone	Large Office sq ft	Assembly sq ft		Climate Zone	Elec Savings (GWh)	...	GHG savings (MT CO <sub>2</sub> e)
Electricity	[X] kWh	X	1	100	20	1	20		1,500	
Peak demand	[X] Watts		2	1,000	1,500	2	50		3,000	
Natural gas	[X] Therms		...			...				
GHG emissions	[X] Tons CO <sub>2</sub> e		16	5,000	3,000	16	100		2,000	



# Compliance and Enforcement

- Design
- Permit Application
- Construction
- Inspection
- Revisions to Compliance Software

# Compliance and Verification Process



## 1. Design Phase

Identify automatic daylighting controls on the plan documents for daylit zones where the connected lighting load is greater than 75 watts



## 2. Permit Application Phase

Check and confirm automatic daylighting controls are identified on the plans and NRCC forms for daylit zones with a connected lighting load greater than 75 watts



## 3. Construction Phase

Procure, install, wire, and commission photocontrols in daylit zones with a connected lighting load greater than 75 watts



## 4. Inspection Phase

- Perform automatic daylighting controls acceptance testing in daylit zones with a connected lighting load greater than 75 watts
- Verify automatic daylighting controls are identified for daylit zones with a connected lighting load greater than 75 watts in approved drawings and documents

# Compliance and Verification

- The general workflow and the compliance and verification process remain unchanged
- The number of photocontrols increases
  - Automatic daylighting controls are identified for more spaces on the plan documents
  - Increase in time and effort required for installation and commissioning
  - Acceptance Test Technicians may need to perform automatic daylighting controls Functional Testing on higher number of photocontrols
    - Acceptance Test Technicians only test 1 photocontrol per group

[EnergyCodeAce.com](https://www.energycodeace.com) provides no-cost tools, training, and resources on code compliance



# Market Actors

Market actors involved in implementing this measure include:

- **Lighting Designer / Daylight Consultant / Electrical Engineer / Energy Consultants / Architect / Interior Designer** – Identify spaces requiring automatic daylighting controls on the plan documents and prepare NRCC forms
- **Plans Examiner** – Check and confirm automatic daylighting controls are identified on the plan documents and NRCC forms
- **Electrical Contractor / Installer** – Procure, install, and wire photocontrols and other necessary hardware and accessories according to the design documents
- **Qualified Design Reviewer** – Ensure automatic daylighting controls are identified and consistent on the plan documents and NRCC forms
- **Commissioning Provider** – Commission the photocontrols as specified in the design documents
- **Acceptance Test Technician** – Conduct the automatic daylighting controls acceptance test
- **Inspector** – Verify automatic daylighting controls are included in the approved drawings and documents

# Software Updates

- The proposed change will require a minor adjustment to the inputs for threshold for daylight dimming.
- No other changes are expected for the CBECC software or ACM Reference Manual.



# Review of Code Language Markup

- Draft Code Change Language





# Draft Code Change Language

Draft code language available for review in Handouts and downloadable on [Title24Stakeholders.com](https://Title24Stakeholders.com).



# Discussion and Next Steps

# We want to hear from you!

- POLL QUESTION NEXT SLIDE
- Provide **any last comments or feedback** on this presentation now, verbally or in the GoTo Questions Pane
- More information on pre-rulemaking for the 2025 Energy Code at <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-building-energy-efficiency>

**Comments on this measure are due by March 10, 2023.** Please send comments to [info@title24stakeholders.com](mailto:info@title24stakeholders.com) and copy CASE Authors (see contact info on following slide).

# Thank You

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