



TITLE 24, PART 6

2028 CODE CYCLE

Luminaire Classification and Power Exception for Alterations & Retrofits

Codes and Standards Enhancement (CASE) Proposal

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Proposal Description

- Code Change Proposal
- Benefits
- Background Information



Proposal Description

The Issue

- **Current rule:** Luminaire wattage is limited to the factory-installed label on the existing luminaire.
 - **Lower wattage cannot be claimed** even if a *lower wattage lamp* is installed
- To claim lower wattage, the luminaire must be removed and replaced
- Replacement can be **costly and burdensome**, especially in concrete or hard ceilings
- May trigger additional expenses (e.g., asbestos mitigation)

The Solution

- Update language to allow use of new lamp wattage
- Proposed change **reduces retrofit burden, cost, and environmental waste**
- **Supports reuse of existing luminaires**, lowering embodied carbon impacts

Note: This proposal serves as the basis for a comment letter focused on clarifying and improving the language of the California Energy Code.

See [Title24stakeholders.com](https://www.title24stakeholders.com) for proposal description, justification, draft code language, and requested data

Proposal Goal

Current Language:

- (c) **Luminaire classification and power.** Luminaires shall be classified, and their wattage shall be determined as follows:
1. Luminaire wattage shall be labeled as follows:
 - A. The maximum rated wattage or relamping rated wattage of a luminaire shall be listed on a permanent, preprinted, factory installed label, as specified by UL 1574, 1598, 2108 or 8750, as applicable; and

Goal:

- Ease retrofit burden by recognizing new lamp wattage in existing luminaires
- Align with evolving ASHRAE 90.1 language where possible
- Prevent fraudulent or inaccurate labeling

Note: *This proposal serves as the basis for a comment letter focused on clarifying and improving the language of the California Energy Code.*

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for proposal description,
justification, draft code
language, and requested data

Proposed Code Change Options

Option 1: Use Lamp Label

- Allow luminaire wattage to be based on the labeled input power of the installed lamp
- Lamp label must be permanent and preprinted

Option 2: Lamp Manufacturer Label for Luminaire

- Require field-installed, permanent, preprinted label supplied by the lamp manufacturer
- Applied directly to the luminaire during retrofit over the original luminaire label

Option 3: Flexible Approach

Wattage can be taken from either:

- Luminaire label (original or new retrofit sticker), **or**
- Manufacturer's permanent, preprinted label on the installed lamp during retrofit

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justification, draft code
language, and requested data

Note: This proposal serves as the basis for a comment letter focused on clarifying and improving the language of the California Energy Code.

Background Information

- **No energy savings** are expected from this proposed code change.
- ASHRAE 90.1 is considering a similar update.
 - **Current language in Section 9.1.4.a:** “For lighting equipment with replaceable lamps, the wattage shall be the labeled maximum wattage of the specified and installed lamps.”
 - Proposal under consideration uses the wattages of the lamps
 - For multi-wattage drivers, the highest wattage is used
- The Statewide CASE Team has pursued this update for several code cycles, but past proposals were submitted too late in the process to be adopted.

Poll

Which option do you prefer for addressing luminaire wattage labeling in retrofit situations?

- a. **Option 1: Use Lamp Label** – use labeled input power of the installed lamp and driver (Aligns with ASHRAE 90.1-2022 proposed language)
- b. **Option 2: Lamp Manufacturer Label for Luminaire**– field-installed, permanent, preprinted label supplied by retrofit manufacturer
- c. **Option 3: Flexible Approach** – allow both Option 1 or Option 2
- d. **Other:** _____
- e. **Do Nothing** – I prefer the language as is

Marked-up Code Language

See Title24stakeholders.com for marked-up code language

Title 24, Part 1

- No changes

Title 24, Part 6

- 130.0(c)1A

Reference Appendices

- No changes



Compliance Verification

- Key Aspects of Compliance Verification
- Barriers and Solutions
- Revisions to Compliance Software

Key Aspects of Compliance Verification

- Who is **qualified and responsible** for installing the label that will be recognized in lighting power calculations?
- What **safeguards** are needed to prevent fraudulent labels claiming lower wattages?
- How would this be **enforceable**?

Poll

When and how should compliance with new wattage labeling requirements be verified?

- a. During plan check only (documentation-based review)
- b. During inspection only (physical verification after installation)
- c. Both plan check and inspection (documentation + field verification)
- d. Other (please specify)

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More information on

[CEC's 2028 proceeding website.](#)

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hear from you!**