

# BPA Non-Residential Lighting Program Frequently Asked Questions



The BPA Implementation Manual provides BPA utility requirements for energy efficiency projects and activities reported to BPA. The Implementation Manual shall take precedence over this FAQ if any descriptions are contradictory. The Implementation Manual is available in the Policy & Reporting section of the following site: <https://www.bpa.gov/EE/Policy/Manual/Pages/default.aspx>

## I. Lighting Support & Training

### 1. I'm a lighting trade ally, how do I learn more about the non-residential lighting program?

a) For general non-residential lighting program information, please contact the BPA lighting team: [lighting@bpa.gov](mailto:lighting@bpa.gov)

b) For information regarding specific lighting projects, please contact your local utility: <https://www.tradeallynetworknw.com/find-a-local-resource/#utility-programs>

### 2. How can I get more training on the Lighting Calculator?

BPA provides in-person and online trainings and is available to help answer your lighting questions. Please contact the BPA lighting team: [lighting@bpa.gov](mailto:lighting@bpa.gov)

### 3. How does a trade ally submit a lighting calculator to BPA?

Trade allies should not submit lighting calculators directly to BPA, whether for invoicing or non-standard measure review. Please work through your local utility.

## II. Lighting Calculator Versions

### 4. As a trade ally, which lighting calculator should I use?

When multiple versions of the lighting calculator are available, utilities determine which version to use. Utilities may also choose to make certain customizations to the program offerings and incentives. Please contact your local utility for more information.

## III. Non-standard Measures

### 5. What is a non-standard measure?

A non-standard measure occurs when:

- a) A measure doesn't achieve the wattage reduction required for a deemed incentive
- b) A measure doesn't meet the minimum existing baseline wattage requirement for a deemed incentive

c) The lighting calculator doesn't offer an appropriate category, wattage, lamps per fixture, or ballast option

All non-standard measures must be submitted to the serving utility for review. Utilities must submit the project to BPA for review.

## 6. Are Decommissioning, Fixture Increase, and auto-calculated Signage and LED Linear measures considered non-standard?

No. Although these measures receive calculated incentives, they are not considered inherently non-standard, and do not require BPA review.

## IV. Technical Question Grab Bag

### 7. I'm a utility. Does BPA require that LED fixtures/lamps be listed on a Qualified Product List (QPL)?

**Deemed Measure LEDs:** The BPA Non-Residential Lighting Program does not require that LED fixtures / lamps be listed on a Qualified Product List (Design Lights Consortium or Energy Star) in order to be eligible for a deemed incentive. Having said that, QPLs are still a good idea--we are empowering utilities with the ability to make their own judgment calls on deemed measure LEDs that aren't listed on a QPL. The BPA Lighting Team is happy to review any LED product and provide feedback as to its viability. However, ultimately, it is up to each utility to determine if the LED's quality and efficacy satisfies their program's requirements.

**Non-standard Measure LEDs:** When a non-standard measure with a proposed LED is submitted, the Lighting Team expects to either: (a) be provided with the model number—either in the body of the email or within the calculator itself, (b) be provided with a product cut sheet, or (c) find clear language within the body of the email or the calculator itself that the LED(s) in question is listed on a QPL. To be clear, there is not a BPA requirement that non-standard measure LED fixtures/lamps be listed on a QPL; however, we do want the opportunity to review the product while reviewing the non-standard measure. Realistically, we would only recommend rejecting LEDs with very poor efficacies or those from highly suspect manufacturers.

Note: Individual utilities may have their own program requirements regarding QPLs.

### 8. Does BPA require that Networked Lighting Controls be listed on a Qualified Product List (QPL)?

Yes. Networked Lighting Controls must be listed on the Design Lights Consortium Networked Lighting Controls QPL.

That QPL can be found on the Design Lights Consortium website:  
<https://www.designlights.org/qpl/>

## 9. What is the best way to enter decommissioning measures into the lighting calculator?

There are two acceptable options for entering decommissioning measures. It is at the utility's discretion to determine which method is used:

1. Enter the measure on one line/row in the lighting calculator. The fixture quantities will be different (e.g. 10 existing HIDs and 9 proposed Exterior LEDs). This will provide a calculated incentive, or;
2. Enter the measure on two lines in the lighting calculator. One line/row will have matching quantities of existing and proposed fixtures (e.g. 9 existing HIDs and 9 proposed Exterior LEDs). The existing and proposed fixture quantities in the second row/line will not match (e.g. 1 existing HID and 0 proposed LEDs).

## 10. Can a project that includes multiple buildings be entered into one lighting calculator?

Because HVAC interaction factors vary by building type, and influence energy savings, it's important to carefully consider the buildings that are involved in any given project. If you have a project that includes multiple buildings, please contact the BPA lighting team at [lighting@bpa.gov](mailto:lighting@bpa.gov) to discuss the project and determine the best course of action.

## 11. I have a project with existing incandescent lamps but I don't see them as an option for existing equipment in the lighting calculator. What happened?

The US DOE published 2 rules for light bulbs in April 2022. One rule updated the definition of General Service Lamps to include most lamps commonly found in commercial installations, including directional lamps (PAR, R, etc.). The second rule implemented a minimum standard of 45 lumens/watt for all General Service Lamps, effectively banning the manufacture or import of almost all incandescent lamps. While you may still find some incandescent lamps in use at non-residential facilities, their replacement with more efficient lighting sources is inevitable and BPA does not view such replacement projects as a conservation resource as defined by the Northwest Power Act.

## V. Project Costs

### 12. Do all retrofit non-residential lighting projects require project cost documentation?

Yes. The total project cost must be identifiable in the customer file documentation.

### 13. What project costs are eligible to include for retrofit projects?

All costs associated with the implementation of the lighting project, including costs incurred from:

- Equipment/Materials (e.g. fixtures, tombstones, connectors, etc.)
- Labor
- Permit fees
- Disposal fees
- Rental equipment (if specific to the lighting project installation)
- Shipping/freight expenses
- Sales tax

### 14. What internal labor costs are eligible project costs?

- Internal labor specific to implementing the lighting project
- Internal engineering and design hours
- In-house commissioning hours

Note: Internal labor costs must be reasonable and at market value.

### 15. What internal labor costs are not eligible projects costs?

Any labor hours not directly associated with the implementation of the lighting project are ineligible (e.g. managers of the employees who are actually performing the work).

### 16. What documentation is required for eligible internal labor costs?

Internal labor documentation should include the employee name or ID, function, rate, and hours directly associated with the project.

If the facility uses an internal hours/billing system, an accounting summary of the hours associated with the project can be used.

Note: BPA reserves the right to review internal rates. Additional justification may be requested to support internal labor cost figures.

### 17. What if I have an invoice that includes non-lighting related items?

Only expenses directly related to the lighting project should be used to calculate and document project cost. Please note on the invoice which items are being included as part of the lighting project cost.

For more information or additional questions, please contact:

the BPA Lighting Team at [lighting@bpa.gov](mailto:lighting@bpa.gov)

Document last updated: 4/29/2024

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