



BPA Nonresidential Lighting Program and Online Lighting Calculator Frequently Asked Questions



The Bonneville Power Administration (BPA) Implementation Manual provides utility requirements for energy conservation 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 [BPA Energy Conservation Implementation Manual](#) webpage.

I. Lighting Support and Training

1. How can trade allies (contractors, electricians, distributors, etc.) learn more about the nonresidential lighting program?

- a) For general nonresidential lighting program information, visit the [BPA's Online Lighting Calculator \(OLC\)](#) webpage.
- b) For information regarding specific lighting projects, contact your local utility or email BPA at lighting@bpa.gov.

2. How can I get more training on the lighting calculator?

Visit the [OLC](#) webpage to access the User Manual and training videos. If you have additional questions, contact the BPA lighting team.

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

Trade allies should not submit a lighting calculator (LC) directly to BPA, whether for invoicing or non-standard measure review. You will work with your local utility to review and submit the project through the OLC.

II. Lighting calculator Versions

4. Which version of the lighting calculator should I use?

All previous versions of the lighting calculator (LC 6.0, LC 5.0 etc.) are obsolete. The OLC will automatically apply the correct incentives offerings based on the assigned utility and project creation date.

III. Non-Standard Measures

5. What is a non-standard measure?

A measure is considered non-standard when one or more of the following are true:

- a) A measure doesn't achieve the required 40 percent wattage reduction 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.
- d) Hours of operation exceed 6570 hours per year.

All non-standard measures must be submitted to the serving utility for review and approval through the OLC.

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 non-standard and do not require any additional review.

IV. Technical Question Grab Bag

7. Does BPA require that LED fixtures or lamps be listed on a Qualified Product List (QPL)?

No. The BPA Nonresidential Lighting Program does not require that light-emitting diode (LED) fixtures or lamps be listed on a Qualified Product List (e.g., Design Lights Consortium or Energy Star) to be eligible for a deemed incentive.

However, utilities may choose to set their QPL requirements if desired. Also, the BPA Lighting Team can review any LED products and provide feedback as to its viability; ultimately, it is up to each utility to determine if the LED's quality and efficacy satisfy their program's requirements.

Note: Individual utilities may have their own QPL requirements.

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

Yes. Networked Lighting Controls must be listed on the [Design Lights Consortium Networked Lighting Controls QPL](#).

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

There are two acceptable methods for entering decommissioning measures. Both methods will result in the same calculated energy savings, but may result in different incentive amounts. The utility may choose either method:

- a) Enter the measure into one line or row in the lighting calculator. The fixture quantities will be different (e.g., 10 existing high-intensity discharges (HIDs) and 8 proposed Exterior LEDs). This option will provide a calculated incentive.

- b) Enter the measure on two lines in the lighting calculator. One line or row will have matching quantities of existing and proposed fixtures (e.g., 8 existing HIDs and 8 proposed Exterior LEDs). The existing and proposed fixture quantities in the second line or row will not match (e.g., 10 existing HID and 8 proposed LEDs). This option will provide a deemed incentive and calculated incentive. The proposed quantity cannot equal 0 (that leads to trying to divide by 0 which isn't possible). Please see the OLC User Manual for more details.

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 is important to carefully consider the buildings that are involved in any given project. If you have a project that includes multiple buildings, contact the BPA lighting team at 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 U.S. Department of Energy published two 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 per 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 nonresidential facilities, their replacement with more efficient lighting sources is inevitable and BPA does not view replacement projects as a conservation resource as defined by the Northwest Power Act.

V. Project Costs

12. Do all retrofit nonresidential lighting projects require project cost documentation?

Yes. The total project cost must be identifiable in the customer file documentation and uploaded to the Hancock Cloud. See section 9.2 in the OLC User Manual for instructions on how to upload documents.

All costs associated with the implementation of the lighting project are eligible for retrofit projects, including costs incurred from:

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

13. 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

14. What internal labor costs are not eligible for projects costs?

Any labor hours not directly associated with implementing the lighting project are not eligible (e.g., managers of the employees performing the work).

15. What documentation is required for eligible internal labor costs?

- Internal labor documentation should include the entity (e.g., company name), rate, and hours directly associated with the project.
- If the facility uses an internal 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.

16. 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 included as part of the lighting project cost.

VI. Fluorescent lamps in Oregon

Oregon passed a law in 2023 (ORS 459.485) that established phased bans on selling most new compact and linear fluorescent lamps statewide.

- Jan. 1, 2024: Screw-base compact fluorescent lamps.
- Jan. 1, 2025: Pin-base compact and linear fluorescent lamps.

In 2025, the Oregon legislature adopted House Bill 2307, signed May 28, 2025, which creates a temporary exception to the fluorescent sales ban for K-12 schools. Under this exception, lamps purchased by K-12 school districts may continue to be sold and used in school buildings until Jan 2, 2030.

17. Is my project or site affected by Oregon's fluorescent lamp ban?

Oregon's ban on the sale of fluorescent lamps applies to all businesses except for K-12 schools. This means that BPA will use local or state energy codes as the effective baseline when calculating energy savings from fluorescent to LED upgrade projects in the state.

If the project you're working on is impacted by the fluorescent ban, you'll need to answer Yes to the OLC baseline eligibility question: Are replacement lamps for the facility's existing lighting fixtures no longer available due to federal or state restrictions? The yes response will set the project up to use the New Construction process in the calculator.

18. Does the ban apply to projects started in FY 2024-2025?

At the retail utility's discretion, retrofit projects started in the OLC before Oct. 1, 2025, may continue to use the existing baselines, including fluorescent lamps. This includes projects affected by the Oregon fluorescent lamp ban.

19. How do I establish lighting code baseline for a project that needs to be entered as a new construction project?

Lighting code baselines are determined by either local or state regulations. For projects impacted by the fluorescent ban, trade allies may not have access to permit documents, that they've typically used to support the values required to use the new construction process in the OLC. Trade allies and utilities can use online software platforms such as [COMcheck](#) to generate the required values instead.

Trade Allies should work with their utilities to determine whether the whole-building or space-by-space method is appropriate for a given project. BPA will accept either whole-building or space-by-space method; however, utilities should consider the potential complexity associated with documenting square footage using the space-by-space method. In most cases, the whole-building method is simpler.

20. How do I use COMcheck?

You must create an account to log in to [COMcheck](#), which is available through the website.

[COMcheck](#) requires entry of either whole-building or space-by-space information related to lighting. Based on the information entered, [COMcheck](#) generates a code-compliant lighting power allowance (watts per square foot). To qualify for incentives, the project must use at least 10 percent less energy than the code allowance.

21. Which COMcheck method should I use: Whole-Building or Space-by-Space?

The appropriate method depends on your project goals.

- Whole-Building method is generally simpler
- Space-by-Space method is more complicated but may result in a higher wattage allowance.

In the example below the space-by-space method allows for more total allowable wattage (e.g., 6,665 W vs 6,200 W). This can result in greater energy savings and higher incentives.

Each project should be evaluated to determine which method results in the most appropriate outcome. BPA will accept either method. However, utilities and trade allies should consider the added complexity of documenting square footage when using the space-by-space method.

90.1 (2022) Standard • Portland, Oregon • Climate Zone 4 • New Construction

INTERIOR LIGHTING

Totals - Building Area Method: Allowed Wattage: 6200 Proposed Wattage: 3630
Totals - Space by Space Method: Allowed Wattage: 6665 Proposed Wattage: 3630

Office
Building Area Type: Office
Space by Space Method: Allowed Wattage: 6665 Proposed Wattage: 3630
Area: 10000 W/ft²: 0.62

Space Name	Area	Lighting Power Density (LPD)	Space Proposed Wattage	Space Target Wattage	Room Cavity Ratio	Allowance	Number of Fixtures	Fixture Wattage	Exemption/ Allowance
Office Cubicles Office - Enclosed +150 sq ft and +-300 sq ft	6000	0.66	2400	3960	0				
↳ Recessed LED Troffer LED							200	12	None
Office Cabins Office - Enclosed +-150 sq ft	1000	0.73	400	730	0				
↳ Suspended Linear LED Ff: LED							40	10	None
Print Room Copy/Print Room	500	0.56	240	280	0				
↳ Compact Fluorescent Fix: Compact Fluorescent							12	20	None
Corridors Corridor/Transition -8 ft wide	500	0.44	350	220	0				
↳ LED PAR LED							50	7	None
Kitchen Food Preparation	500	1.19	100	595	0				
↳ Suspended Linear LED Ff: LED							10	10	None
Conference rooms Conference/Meeting/Multipurpose	1000	0.88	140	880	0				
↳ LED PAR LED							20	7	None

22. How do I establish project costs when using a code baseline?

BPA requires lighting projects using the new construction process to enter an Incremental Project Cost value in the Estimated/Actual Cost field in the OLC. For lighting upgrade projects impacted by the fluorescent ban, there are two options for establishing an incremental project cost value:

- 1) Compare actual costs to an alternate bid that aligns with a design that matches code maximum allowance values (i.e. Code Minimum Bid – Actual Costs = Incremental Project Cost), or
- 2) Multiply the materials cost of the upgrade project by 25 percent.

23. How should I submit a project where the existing lighting system includes a mix of fluorescent and non-fluorescent fixtures?

Projects where the existing lighting system includes a variety of lighting technologies can be complicated, so BPA recommends that utilities and trade allies discuss the appropriate approach before proceeding with OLC data entry.

- 1) Create one OLC project using the new construction process. This calculator will use the code baseline for the entire project scope.
- 2) Create two distinct OLC projects
 - a. One OLC project uses the retrofit approach in the calculator for those parts of the project that don't involve fluorescent to LED retrofits
 - b. One OLC project uses the new construction process for those parts of the project that do involve replacing existing fluorescent fixtures or lamps.

Utilities should consider potential complexity when deciding which approach to use for their projects.

- For some projects partitioning the areas served by fluorescent and non-fluorescent lighting systems will be straightforward, but in other situations they may be intermixed within a single lighting zone.
- If the 2-project approach is used, costs will need to be entered separately for each OLC project and care must be taken not to include the same costs in both.

For questions, please contact BPA at lighting@bpa.gov.