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[CEA] Compliance Improvement - Title 24, Part 6 Language on the Role of ATT

Additional submitted attachment is included below.

To: California Energy Commission
From: California Energy Alliance
Date: November 21, 2025
Subject: Compliance Improvement: Title 24, Part 6 Language on the Role of ATT

Dear Commissioners and Staff,

The California Energy Alliance (CEA) strongly supports the Commission's recent focus on strengthening Energy Code compliance. The CEC's recent activities such as hosting public workshops, studies, and direct engagements with a diverse group of stakeholders are essential in achieving statewide energy compliance. While progress is being made, significant systemic obstacles remain and require the Commission's immediate and concentrated attention.

This letter is focused on reminding the energy ecosystem, the CEC, and Authorities Having Jurisdiction (AHJs) on the scope of work of the Acceptance Test Technician (ATT) as it relates to ensuring that California's energy savings objectives are being met. This letter aims to address the confusion surrounding the proactive role and responsibilities of the ATT and represents both the mechanical and lighting perspectives of the Acceptance Testing community within the California Energy Alliance. This letter is focused on the language pertaining to the Role of ATT. If left unchanged, the compliance gap will persist and likely worsen, preventing the State from achieving its energy savings goals. **This is an urgent call to action for the California Energy Commission to consider a mid-cycle amendment to the 2025 Energy Code, specifically to reintegrate a proactive scope of work for the Acceptance Testing Technician (ATT) at the design and plan check phases. CEA understands that the original 2013 language requiring ATT certification of plans and specifications contributed to the revised language in the 2016 code. CEA's strong recommendation is that the mid-cycle amendment will provide ATTs with the role of a recommended (but not required) advisor.** This mid-cycle suggestion will decrease compliance gaps statewide and improve affordability for California's diverse consumers. In parallel with this amendment, we strongly recommended to simultaneously consider a comprehensive proposal for the 2028 energy code cycle to ensure the ATT role remains strongly engaged in compliance work for the long-term.

1) ATT Scope of Work and Preserving California's Clean Energy Workforce.

ATTs are California's frontline energy efficiency knowledge workers. They should be re-engaged where they add the greatest value, at the design and permitting stage, so ATTs can advise designers and plan checkers to help meet compliance requirements before installation. By helping design teams submit compliant drawings, the compliance review burden placed on AHJs¹ will be minimized for it is the ATT's role to be a reliable Energy Code resource to AHJs. Whether it is advising designers or plan checkers, the ATTs active participation before construction will reduce the need for costly post-construction retrofits, thereby saving time, money, and energy while ensuring the Energy Code delivers the savings and consistency it was designed to achieve.

The ATTs are the tip of the iceberg for the clean energy workforce. Their work in enforcement of the requirements at the appropriate time will align the remainder of the trades in installation of required elements, thus legitimizing and realizing the workforce development efforts supported by CEC and other state entities. The workforce magnitude is larger than the ATTs themselves, making the ATTs a lynchpin for the broader labor market transformation. The ATT is a catalyst to ensure that a clean energy workforce is part of enforcing quality and compliance of California's energy codes.

2) 2013 Energy Code on Acceptance Testing: The wording of the 2013 language was effective in describing the role of the ATT as stated below.

- a) Lighting: Section 130.4(a)1 required not only Acceptance Testing but also certification of plans, specifications, installation certificates, and operating and maintenance information.
- b) Mechanical: Section 120.5(b) the Acceptance Testing specified by Section 120.5(a) shall be performed by a certified mechanical acceptance test technician (CMATT.)

¹ DOCKET LOG 24-BSTD-05, TN 267122, [CodeCycle-org Comments - Underestimation of Impacts to Local Government from Title 24](#)

3) What Happened: The systemic erosion of the ATT role and the increase in California's noncompliance.

- a) Between the 2013 and 2016 Energy Code cycles, the energy code language governing the ATT's role underwent a major change that significantly reduced the ATT's scope of work and participation timeline. This change was applied without the involvement and public input from ATTCPs, which are the organizations responsible for training and certifying that frontline energy efficiency workers to be skilled, trained, and dispatched to conduct tests.
- b) Checking a box at the end of a project is not compliance. Compliance is performed by highly skilled and trained professionals who possess an advanced set of applied technical knowledge that goes beyond general construction knowledge such as being able to understand advanced automated lighting and mechanical controls. This skilled and trained professional is the Acceptance Test Technician (ATT.)
- c) 2016 Energy Code:

130.4 A

Changed to:

Certifies that all of the lighting Acceptance Testing necessary to meet the requirements of Part 6 is completed.

- d) The results:

The revised language singularly focused the ATT role on final Acceptance Testing, positioning technicians to end-of-line verification and removing the crucial function of plans and specifications review.

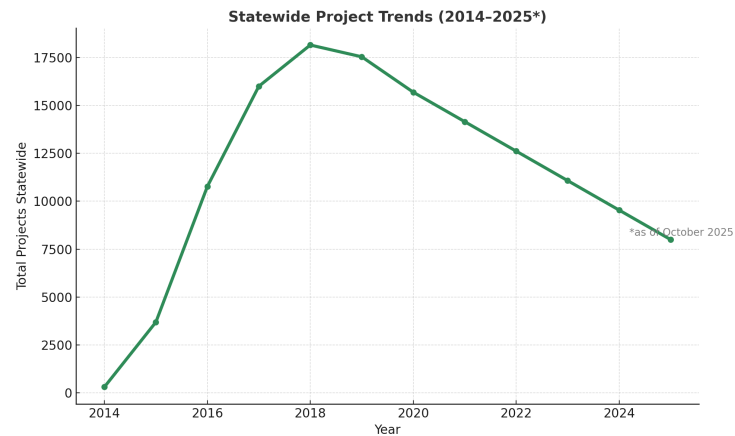
This shift eliminated the ATTs role during the design and permitting phases, a change that inevitably resulted in the increased volume of non-compliant permit submittals.

Compounded by the significant resource and expertise challenges² faced by AHJs in reviewing the full breadth of Title 24, critical compliance gaps are now routinely overlooked until the final, post-construction inspection. When these code violations are identified at this late stage, remediation is typically highly expensive, severely delaying project timelines, and requiring time-consuming retrofits.

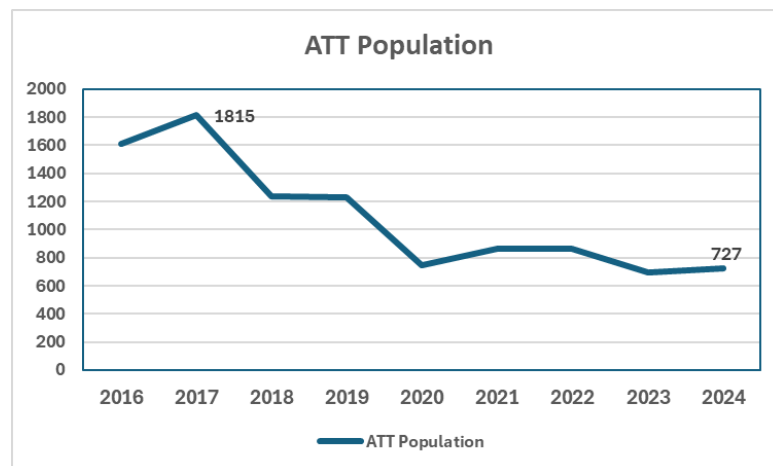
² DOCKET LOG 24-BSTD-05, TN 267122, [CodeCycle-org Comments - Underestimation of Impacts to Local Government from Title 24](#)

The change in the Energy Code wording (from 2013 to 2016) dismantled the effectiveness of the Acceptance Test Technician (ATT) program; thus, significantly reducing Energy Code Compliance.

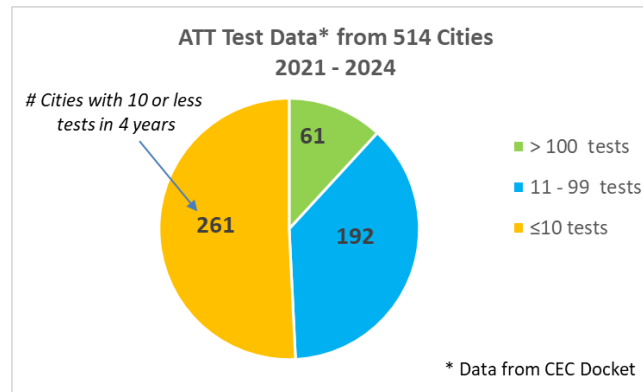
- e) This graph illustrates the declining trend in Acceptance Testing rates across the State of California over the last ten-year period, specifically from 2014 to mid 2025. (Figure 4d)



- f) The decline in Acceptance Testing compliance is similar to the decline of ATTs because the amount of work has been reduced. CEA believes that this was a result of the changes made to the code which reduced the engagement of the ATTs. The image below shows a long-term decline on lighting data. (Figure 4e)



- g) *Based on CEC data.* This pie chart illustrates that over half of California's local jurisdictions have recorded fewer than 10 Acceptance Test Technician (ATT) tests across a four-year period. This data demonstrates the widespread impact of the change in the code structure and how that change substantially reduced compliance support to local authorities. (Figure 4f)



4) Noncompliance is a risk to California's climate goals and workforce infrastructure.

The Acceptance Testing Technician is a critical frontline energy efficiency worker that plays a crucial role in achieving California's climate goals.

The purpose of energy efficiency equipment is to reduce consumption, and by extension, reduce CO2 emissions and other greenhouse gases. This climate benefit is only realized if the equipment is verified to operate at its optimum efficiency.

The systemic failure this letter is addressing undermines California's climate objective. When compliant systems are not ensured at the design phase, the state loses energy savings that translate directly into emissions reductions. Restoring the ATT's proactive role is not just about fixing a code section; it's a means to prevent the ongoing loss of verified energy savings³. When Acceptance Testing technicians are not fulfilling their roles, the entire chain of compliance fails and systemic noncompliance persists across the state.

³ DOCKET LOG 24-BSTD-05, TN 267122, [CodeCycle-org Comments - Underestimation of Impacts to Local Government from Title 24](#)

By eliminating the responsibility for plan and specification review, the 2016 code change effectively downgraded ATTs from proactive compliance aids at the design phase to mere reactive testers at the end of the project. This single change stripped design teams and plan checkers of critical technical support during the permitting process and has directly caused widespread late-stage failures, costly rework, and a significant decline in ATTCP participation.

The ATT scope of work is a high-road job in California's clean energy economy that demands specialized technical expertise and training; however, the persistent reduction in code compliance has caused the dramatic decline of certified, highly-skilled ATT technicians. Given that the ATTs operate as a critical workforce for energy code compliance, their systemic collapse risks the loss of a foundational asset for statewide compliance. Unless ATTs are reintegrated where designs, plans, NRCCs, and permits are first reviewed, compliance outcomes will continue to drop.

5) California Energy Alliance (CEA)'s steps for collaborative action.

- a) The CEA understands that beyond identifying the problem, providing actionable solutions will be helpful for the Commission's consideration. CEA will follow regulatory steps and submit draft language for a mid-cycle amendment to restore Title 24, Part 6 Language on the Role of the ATT to Commission staff.
- b) CEA is continuously hosting working group sessions for California's diverse energy stakeholders on Compliance Solutions ensuring that steps to achieve an **Integrated Compliance Enforcement Ecosystem** are developed.
- c) CEA strongly supports the publication of the CEC's Blueprint as a mechanism for clearly and consistently communicating critical Energy Code updates and resources to local jurisdictions. CEA is requesting to consistently add a memo on its Blueprint publication in clarifying the role of the ATT.
- d) CEA has had a long recorded history of engaging the California Energy Commission and the larger Energy Ecosystem on linking the Acceptance Testing Compliance to the larger Compliance Improvement and Enforcement in California:

- i. NLCAA submittal Docket: 22-BSTD-01 TN 25261- wording reinstatement request

- ii. CALCTP submittal Docket: 22-BSTD-01 TN 25267- wording reinstatement request
- iii. CEA submittal Docket: 22-BSTD-01 TN 25276 - wording reinstatement request
- iv. CEC 2025 Gap Analysis Docket 24-BSTD-05 TN 265065, confirming systemic failures tied to lack of early oversight, poor permit data, and weak accountability
- v. California Unions for Reliable Energy Docket 24-BSTD-05 TN 266003, Recent Comments on the Energy Code Compliance Gap Analysis warning that more study without immediate enforcement threatens collapse of the ATTCP program and calling for enforcement of Acceptance Testing and permit requirements now.
- vi. and more.

6) Conclusion

The California Energy Alliance's mission is to bring beneficial, equitable change to energy standards, policies, and programs by developing consensus among diverse and engaged stakeholders. The ATT community, California's frontline energy efficiency workers, is part of our energy ecosystem.

While the CEA encourages the Commission's continuous examination and activities focused on compliance improvement across the state, the CEA is looking forward to seeing and participating in actionable steps. The CEA looks forward to continuous engagement with the Commission, its leadership and staff, in fulfilling our shared goal of a clean energy future for all Californians. This submission is our urgent call to action for the CEC to consider a mid-cycle amendment to reinstate the proactive scope of work of the ATT at the design phase in the existing energy code and call for continuously issuing a Blueprint publication that clarifies the role of the ATT as immediate steps in resolving the complex challenge of noncompliance.

This urgent call to action is not the start of a new project. Rather, it is a necessary correction to prevent continuous systemic failure as the current compliance infrastructure is showing the need for an immediate **Integrated Compliance Enforcement Ecosystem**.

Respectfully submitted,

California Energy Alliance



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