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Comments Regarding Annual Reporting Format – Permit Number and Address Fields Should Be Required

Additional submitted attachment is included below.

May 28, 2026

California Energy Commission

Dockets Office

715 P Street

Sacramento, CA 95814 95814

RE: Comments Regarding Annual Reporting Format – Permit Number and Address Fields Should Be Required

Dear Members of the California Energy Commission:

On behalf of the National Lighting Contractors Association of America (NLCAA), we respectfully submit the following comments regarding the California Energy Commission's recently revised annual reporting format. The revised format represents a meaningful step forward in tracking acceptance testing activity statewide; however, NLCAA is concerned that the permit number and project address fields are designated as optional rather than required data elements. These two fields are essential to the integrity and utility of the reporting data, and NLCAA urges the Commission to amend the format to make them mandatory.

I. Background

The CEC's annual reporting requirements serve as a foundational mechanism for tracking acceptance testing activity performed by ATTs and ensuring that such work conforms to the California Energy Code (Title 24, Part 6). ATTs are the field-level professionals responsible for conducting mandatory acceptance tests on lighting controls, mechanical systems, and other energy-consuming building systems. Their work is the critical last step in verifying that installed systems operate as designed and comply with the Energy Code before a building is occupied. The annual reporting format provides the CEC and ATTCPs with a record of that activity and serves as an essential tool for identifying trends, targeting oversight resources, and verifying that permitted projects have received required acceptance testing.

NLCAA has reviewed the current annual reporting format and notes with concern that the fields for permit number and project address are designated as optional. This designation significantly diminishes the utility of the reporting data and undermines both the CEC's and ATTCPs' ability to conduct meaningful compliance oversight of ATT activity in the field.

II. The Case for Mandatory Permit Number and Address Fields

A. These Data Fields Are Essential for ATT Field Compliance Tracking

The permit number and project address are the two most fundamental identifiers that connect an ATT's annual report to a specific, verifiable project in the field. Without these fields, reported data becomes effectively anonymous and cannot be cross-referenced against local building department records, matched to Certificate of Compliance documentation, or used to confirm that acceptance testing was performed on a lawfully permitted project. As an ATTCP, NLCAA is obligated to monitor and audit the activities of the ATTs we certify. Any reporting format intended to support Title 24, Part 6 compliance must include the basic geographic and administrative identifiers necessary to locate and verify the reported acceptance testing activity.

B. Optional Fields Reduce Data Integrity

Optional fields can result in incomplete and unreliable datasets. This inconsistency makes it impossible to conduct systematic audits, identify patterns of non-compliance, or compare ATT activity across certifying bodies, regions, or reporting periods. Making these fields required would immediately and substantially improve the quality and analytical value of the data collected by the CEC and relied upon by ATTCPs in discharging their oversight responsibilities.

C. Required Fields Support ATT Accountability and Program Integrity

Requiring permit numbers and project addresses on annual reports sends a clear signal to ATTs that their reported activities are subject to verification by both the CEC and their certifying ATTCP. This accountability function would act as a deterrent to fraudulent or incomplete reporting and protect the credibility of the ATTCP program.

D. The Reporting Burden on ATTs Is Minimal

NLCAA acknowledges that the CEC must balance the benefits of data collection against the administrative burden placed on reporting entities. However, in this instance, the burden of providing a permit number and project address is negligible. Any ATT performing acceptance testing on a permitted project will have this information readily available in the project documentation they are required to review before conducting tests. Requiring these fields imposes no meaningful additional compliance cost on ATTs while yielding significant benefits for field oversight and enforcement of Title 24, Part 6.

III. NLCAA's Recommendation

NLCAA strongly recommends that the California Energy Commission amend the annual reporting format to designate the permit number and project address fields as **required** data elements. This change is straightforward, low-cost, and would meaningfully strengthen the CEC's ability to track ATT field activity, support ATTCP oversight obligations, and ensure robust enforcement of Title 24, Part 6 compliance across California.

NLCAA stands ready to work collaboratively with the Commission on this and other measures that strengthen the ATTCP program and advance the goals of California's energy efficiency standards. We appreciate the opportunity to submit these comments and respectfully urge the CEC to act on this recommendation.

Respectfully submitted,

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