

DOCKETED

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**Supplemental Comments of the National Lighting Contractors
Association of America (NLCAA)**

Additional submitted attachment is included below.



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California Energy Commission
Dockets Office, MS-4
Docket No. 25-BSTD-03
1516 Ninth Street
Sacramento, CA 95814

Supplemental Comments of the National Lighting Contractors Association of America (NLCAA)

RE: Supplemental Comments on TN 271548 – CALCTP 2028 Proposal, "Lighting Controls ATT and ATE Equitable Audit Process" (Docket No. 25-BSTD-03, 2028 Energy Code Pre-Rulemaking)

Dear Chair, Commissioners, and Dockets Office Staff:

Following the submission of NLCAA's comments on TN 271548, the Association has continued discussions regarding CALCTP's proposal and the shared objective of strengthening California's Title 24 compliance process.

After further deliberation, NLCAA wishes to clarify and refine one aspect of its previous comments.

NLCAA recognizes CALCTP's objective of improving quality assurance through increased auditing and supports efforts that strengthen confidence in the Acceptance Test Technician Certification Provider (ATTCP) program. In that spirit, NLCAA is prepared to support increasing the Desk Audit sampling requirement from one percent (1%) to five percent (5%).

Because desk audits are largely administrative in nature, NLCAA believes the additional workload can be absorbed through adjustments to existing administrative processes. While this change will increase operating costs, NLCAA is willing to support those additional administrative responsibilities in the interest of improving the consistency and integrity of the statewide compliance process.

NLCAA's position differs, however, with respect to the proposed increase in Site Audits.

Unlike desk audits, site audits require scheduling, travel, field personnel, coordination with technicians and project stakeholders, and significantly greater operational overhead. Increasing the mandatory field audit rate from one percent (1%) to five percent (5%) would require a substantial expansion of field resources that cannot be supported under the current level of Title 24 enforcement and acceptance-testing activity.

Until statewide enforcement generates a sustainable volume of legitimate acceptance-testing projects, a fivefold increase in mandatory site audits would represent an unfunded operational burden on ATTCPs.

Accordingly, NLCAA respectfully modifies its previous comments as follows:



- NLCAA supports the proposed revision to the audit-selection language based on completed projects calculated by building permit.
- NLCAA supports increasing the Desk Audit requirement from one percent (1%) to five percent (5%) as a reasonable administrative enhancement that will strengthen ATTCP quality assurance.
- NLCAA does not support increasing the mandatory Site Audit requirement from one percent (1%) to five percent (5%) unless accompanied by corresponding improvements in statewide enforcement that create the project volume and financial resources necessary to support the expanded field oversight.
- NLCAA remains committed to working collaboratively with CALCTP, the Commission, and fellow ATTCPs to improve California's acceptance-testing program while developing an audit framework that is both effective and economically sustainable.

NLCAA appreciates the opportunity to supplement its previous comments and looks forward to continued collaboration with the Commission and all stakeholders to strengthen the implementation and enforcement of California's Building Energy Efficiency Standards.

Sincerely,

Michael Scalzo
Executive Director
National Lighting Contractors Association of America (NLCAA)