

October 8, 2013

Attn Dockets Unit (MS-14)
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

**Subject Application for Confidential Designation Certification Provider Application Submittal
Number 1 - CALCTP Acceptance Test Curriculum Materials and Test Questions**

Dear Dockets Unit

ICF International, in its capacity as program administrator for the California Advanced Lighting Controls Training Program (CALCTP), hereby requests that the California Energy Commission designate as confidential, pursuant to California Code of Regulations, title 20, section 2505, the attached CALCTP acceptance test curriculum materials and test questions ICF will be submitting these materials to Christopher Olvera of the California Energy Commission's Compliance and Enforcement Unit as part of CALCTP's application to become a Lighting Control Acceptance Test Technician Certification Provider under California Code of Regulations, title 24, Part 6, § 10-103-A

Attached is the Application for Confidential Designation for your review and five electronic copies on cd-rom of the documents for which confidentiality is sought Each electronic copy is marked with the title "Confidential - CALCTP acceptance test curriculum materials and test questions submittal #1 "

We are submitting these materials to Mr Olvera for CEC staff review in order to confirm they cover the topics outlined in title 24, Part 6, § 10-103-A The enclosed curriculum we are submitting now is designed to be sufficient for someone who has already completed and passed at least 20 hours of CALCTP-installer certification courses In subsequent submittals we will provide additional curriculum and testing requirements for non-CALCTP-certified installers who have not met these pre-requisites to CEC staff

Also attached is a document titled "Public Summary of Application Materials Designated Confidential Lighting Control Acceptance Test Technician Certification and Lighting Control Acceptance Test Employer Certification- Provider Application Submittal Number 1 - CALCTP Acceptance Test Curriculum Materials and Test Questions," which provides a summary of the information sought to be designated confidential This summary may be disclosed to the public and we would encourage all applicants to develop similar summaries

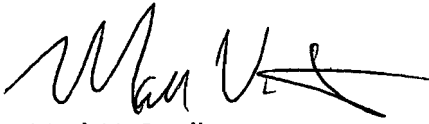
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If you have any questions, please do not hesitate to contact me

Sincerely,

A handwritten signature in black ink, appearing to read "Mark V Ouellette". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mark V Ouellette
Senior Program Manager
Enclosure/Attachment

cc Chris Olvera, CEC Compliance and Enforcement Unit
Bernie Kotlier
Tom Enslow

APPLICATION FOR CONFIDENTIAL DESIGNATION

(Title 20 Cal Code Regs , § 2505 et seq)

An application to keep a record confidential shall be submitted directly to the **Docket Unit** on electronic media, but not by email. Five electronic (5) copies of the record for which confidentiality is sought must be submitted, on separate media, each marked on the media with the title of the record and "confidential" (§ 1209.5, subd (a)(4)). The application may be on a sheet separate from, but attached to, the record. The application will then be acted upon by the Executive Director in consultation with the Chief Counsel of the Energy Commission (§ 2505, subd (a)). (Nov 30, 2011 Standing Order)

TO Energy Commission Docket Unit

RE Application for to become a Lighting Control Acceptance Test Technician Certification Provider under California Code of Regulations, title 24, Part 6, § 10-103-A (Attn: Chris Olvera, CEC Compliance and Enforcement Unit)

APPLICANT ICF International – program administrator for the California Advanced Lighting Controls Training Program (CALCTP)

ADDRESS 601 W 5th Street, Suite 900, Los Angeles, CA 90071

- 1(a) Title, date, and description (including number of pages) of the information or data for which you request confidential designation. **Information or data seeking a designation of confidentiality must be included with this application**

TITLE Certification Provider Application Submittal Number 1 "CALCTP Acceptance Test Curriculum Materials and Test Questions"

Description

(1) CALCTP Acceptance Test (CALCTP-AT) Technician Curriculum (pages 204) (October 8, 2013)

(2) CALCTP-AT Employer Curriculum (pages 147) (October 8, 2013)

(3) CALCTP-AT Technician Test Questions Bank (pages 15) (October 8, 2013)

(4) CALCTP-AT Employer Test Questions Bank (pages 10) (October 8, 2013)

- 1(b) Specify the part(s) of the information or data for which you request confidential designation

Applicant requests that all of the information and data described in Section 1(a) be designated confidential

- 2 State and justify the length of time the Energy Commission should keep the information or data confidential

Applicant requests that the information and data be kept confidential indefinitely to protect the integrity of the certification testing process and to protect Applicant's trade secrets. Because this will be an ongoing certification program, there is no date certain for when this information will no longer need to be kept confidential

- 3(a) State the provision(s) of the Public Records Act (Gov Code, § 6250 et seq) or other law that allows the Energy Commission to keep the information or data confidential, and explain why the provision(s) apply to that material

Two applicable grounds exist for keeping CALCTP's training materials and tests confidential

First, the California Public Records Act allows for the non-disclosure of [t]est questions, scoring keys, and other examination data used to administer a licensing examination, examination for employment, or academic examination " (Gov Code § 2254, subd (g))

Second, the California Public Records Act allows for the non-disclosure of trade secrets (Gov Code, §§ 6254(k), 6276 44, see also Evid Code, § 1060)

- 3(b) Discuss the public interest in nondisclosure of the material submitted for a confidential designation. If the material contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, please state how it would be lost, the value of the information to the applicant and the ease or difficulty with which the information could be legitimately acquired or duplicated by others

If the attached documents are released to the public, the integrity and effectiveness of the certification process will be compromised, resulting in less reliable and effective acceptance tests. Reliable and effective acceptance tests are critical to ensure that buildings perform as designed and that the public receive the expected cost savings in energy efficiency.

In addition the record should not be disclosed because it contains trade secrets, or its disclosure would otherwise cause loss of a competitive advantage.

The specific nature of the advantage -The confidential record is of a technical nature which provides a business advantage over parties without access to the information. The CALCTP curriculum and test was developed for individuals interested in becoming certified as Lighting Control Acceptance Test Technicians. Since other entities can become acceptance technician certification providers, making this information public would impact CALCTP's competitive advantage.

How the advantage would be lost -Time and resources have been spent compiling the information within the confidential record and the value of the information would be significantly impaired if made available to the public.

The value of the information to the applicant -The confidential record is valuable to the project because of (1) the time and resources expended to compile the information, (2) the efforts to maintain the confidentiality of the confidential record, and (3) the use of the information to facilitate ongoing business activities.

The ease or difficulty with which the information could be legitimately acquired or duplicated by others -The confidential record is not readily available on the marketplace and can only be obtained with a significant investment of time and money. Thus, others could not easily acquire or duplicate this information.

- 4 State whether the information or data can be disclosed if it is aggregated with other information or masked to conceal certain portions (including but not limited to the identity of the applicant) State the degree of aggregation or masking required If the data cannot be disclosed even if aggregated or masked, explain why

We have attached to the application a summary of the information and data sought to be designated as confidential, which aggregates and masks the content of the documents for which we request confidentiality This attached summary is titled "Public Summary of Application Materials Designated Confidential Lighting Control Acceptance Test Technician Certification Provider Application Submittal Number 1 - CALCTP Acceptance Test Curriculum Materials and Test Questions" and may be disclosed to the public Further disclosure beyond this summary is not possible without revealing examination data in a manner that would compromise the integrity of the certification process or that would reveal trade secrets whose value would be impaired if publicly disclosed

- 5 State how the material is kept confidential by the applicant and whether it has even been disclosed to a person other than an employee of the applicant If it has, explain the circumstances under which disclosure occurred

The Applicant has not disclosed any of the subject confidential information to anyone other than certain authorized employees, attorneys, consultants, and others with a specific need for the information The material is only available to training sites and instructors for teaching The test questions are distributed for the test and then resubmitted back to the CALCTP administration for annual test review

I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge and that I am authorized to make the application and certification on behalf of the applicant

Dated October 8, 2013

Signed Mark V. Ouellette

Name (print or type) Mark V Ouellette

Title (print or type) Senior Program Manager, ICF International

Representing California Advanced Lighting Controls Training Program (CALCTP)

Include additional signature blocks if there are multiple partners in the project with shared responsibilities for making the request

CALCTP - AT

Public Summary of Application Materials Designated Confidential Lighting Control Acceptance Test Technician Certification and Lighting Control Acceptance Test Employer Certification- Provider Application Submittal Number 1 CALCTP Acceptance Test Curriculum Materials and Test Questions

Purpose of Summary California Advanced Lighting Controls Training Program – Acceptance Test (CALCTP-AT) is submitting documents to the California Energy Commission staff for preliminary review as part of its application to be approved as a Lighting Control Acceptance Test Technician Certification Provider (“Submittal 1”) Submittal 1 contains copies of the CALCTP-AT course materials, course outlines, hands-on exercises, lab exercises, test questions, and scoring keys CALCTP-AT has developed these materials for both CALCTP-AT Technicians and CALCTP-AT Employers and this submission includes information for both courses CALCTP-AT has requested that these documents be designated confidential in order to protect the integrity of the certification testing process and to protect Applicant’s trade secrets

This summary has been prepared in order to provide the public an opportunity to review and comment on these application documents without disclosing proprietary information or sensitive testing materials This summary may be disclosed to the public

Scope of Submittal 1 Submittal 1 provides the acceptance test curriculum and test questions that cover the approximately 16 hours of training and testing that will be provided to certify applicants who already possess a CALCTP installer certification These applicants have already taken the 50 hour CALCTP installer certification course and have completed the Lighting Controls Association website modules *EE101 Introduction to Lighting Control, EE102 Switching Control, EE103 Dimming Control, and EE201 Daylight Harvesting* The 16 hour CALCTP-AT certification builds on the experience, training and skills of CALCTP-certified general electricians Because CALCTP-certified general electricians have a verifiable advanced knowledge and experience base in advanced lighting controls, CALCTP-AT provides CALCTP-certified installers with a more-streamlined, faster paced CALCTP-AT certification program

Applicants that are not CALCTP installer certified shall have to complete additional pre-requisite curriculum and testing requirements in order to provide them with the necessary foundation to complete the final 16 hours of advanced lighting control acceptance test training This supplemental curriculum and testing material shall be provided in subsequent submittals to Commission staff and shall be part of the final application

Submittal 1 also provides the curriculum and test questions for Lighting Control Acceptance Test Technician Employers The CALCTP-AT Employers course is a 6-hour course that explains the energy code, the role of the technician, and the roles and responsibilities of the lighting controls acceptance test employer

This submittal also provides instructions on how existing CALCTP lab boards are to be set up to conduct the CALCTP-AT course This submittal however does not include specifications for the design of the

entire lab boards that are used for pre-requisite training or the required qualifications and training of the instructors That information shall be provided in subsequent submittals

Summary of Documents Provided

Below is a summary of the content of the materials submitted at a level of detail that is intended to provide a meaningful description of the program without disclosure of proprietary materials or sensitive test information

CALCTP-AT Technician Course

Course Description On December 12, 2012, the California Energy Commission adopted changes to the California building Efficiency Standards (Title 24, Parts 1 and 6) that require certain lighting controls and devices to be certified as properly installed and operational, prior to issuance of occupancy permits As required in the regulations, all acceptance test technicians, responsible for testing and certification of these devices, receive targeted training to ensure they and their employers acquire minimal level of training and skill to verify nonresidential lighting controls comply with existing Energy Efficiency Building Standards This course covers the required training mandated by the California Energy Commission

Course Outline This course is divided into four modules consisting of both lab and lecture activities The modules content is organized to answer the following questions about lighting controls verification what is in the energy code, what is the test technician responsibilities, what are the employer's responsibility, acceptance test processes, acceptance test procedures for indoor lighting, acceptance testing procedures for outdoor lighting, and compliance documentation

Learning Objectives

- Understand the purpose and scope of installation and acceptance testing
- Identify the buildings and lighting systems that require acceptance testing
- Understand the role and responsibilities of lighting controls acceptance test technicians and technician employers
- Review lighting systems compliance documentation requirements

Course Structure 4 modules of 4 hours each covering

- 1 Lighting controls acceptance testing – Introduction and Installation Requirements
- 2 Lighting controls acceptance testing – Acceptance test procedures
- 3 Laboratory exercises
- 4 Review, exam, and evaluation

Class Size Given the technical requirements of the course, CALCTP board policy requires the classroom trainer-to-trainee ratio is 1 20 and the lab ratio is 1 10

Purpose of Test To determine competency of CALCTP AT Candidate in both lab and written exercises to ensure work is done accurately and efficiently

Number of Test Questions Each examination consists of 60 equally weighted multiple-choice questions, with four choices per question 50 of the questions are scored and 10 of the questions are un-scored pilot questions The pilot questions are randomly distributed throughout the examination and are not

identified All questions will be extensively reviewed prior to use and will receive additional regular evaluation for unforeseen bias during the course of their use in the exam

Time Limit The time limit for the examination is two hours

Required to Pass In addition to a final exam, CALCTP includes lab activities that must be validated by the instructor CALCTP requires that all participants must complete each laboratory module with 100% (Pass/Fail) competency in lab exercises to move to the next laboratory module The final exam requires a 75% pass rate

General Topic Areas of Test Questions Test questions relate back to a job task analysis created by experts and cover the following topics

- 1 Lamp and ballast systems,
- 2 Line voltage switching controls,
- 3 Low voltage switching controls,
- 4 Dimming controls,
- 5 Occupancy sensors,
- 6 Photosensors,
- 7 Demand responsive signal inputs to lighting control systems,
- 8 Building Energy Efficiency Standards required lighting control systems,
- 9 Building Energy Efficiency Standards required lighting control system-specific analytical/problem solving skills,
- 10 Integration of mechanical and electrical systems for Building Energy Efficiency Standards required lighting control installation and commissioning,
- 11 Safety procedures for low-voltage retrofits (<50 volts) to control line voltage systems (120 to 480 volts),
- 12 Accurate and effective tuning, calibration, and programming of Building Energy Efficiency Standards required lighting control system,
- 13 Measurement of illuminance according to the Illuminating Engineering Society's measurement procedures as provided in the IESNA Lighting Handbook, 10th Edition, 2011, which are incorporated by reference, and,
- 14 Building Energy Efficiency Standards lighting controls acceptance testing procedures (these are set forth in (i)

CALCTP-AT Employers Course

Course Description On December 12, 2012, the California Energy Commission adopted changes to the California building Efficiency Standards (Title 24, Parts 1 and 6) that require certain lighting controls and devices to be certified as properly installed and operational, prior to issuance of occupancy permits. As required in the regulations, all acceptance test technicians, responsible for testing and certification of these devices, receive targeted training to ensure they and their employers acquire minimal level of training and skill to verify nonresidential lighting controls comply with existing Energy Efficiency Building Standards. This course covers the required training mandated by the California Energy Commission.

Course Outline This course consists of one module with lecture activities. The module content is organized to answer the following questions about lighting controls verification: what is in the energy code, what are the test technician responsibilities, what are the employers responsibilities, acceptance test processes, overview of acceptance test procedures for indoor lighting, overview of acceptance testing procedures for outdoor lighting, and compliance documentation.

Learning Objectives

- Understand the purpose and scope of installation and acceptance testing
- Identify the buildings and lighting systems that require acceptance testing
- Understand the role and responsibilities of lighting controls acceptance test technicians and technician employers
- Review the process for lighting controls acceptance tests
- Review lighting systems compliance documentation requirements

Course Structure 1 module of 6 hours covering

- 1 Lighting controls acceptance testing – Introduction and Installation Requirements
- 2 Lighting controls acceptance testing – Acceptance test procedures
- 3 Review, exam, and evaluation

Class Size Given the technical requirements of the course, CALCTP board policy requires the classroom trainer-to-trainee ratio is 1:20.

Purpose of Test To ensure that CALCTP-AT certified employers understand the purpose and scope of installation and acceptance testing and the role and responsibilities of lighting controls acceptance test technicians and technician employers.

Number of Test Questions Each examination consists of 35 equally weighted multiple-choice questions, with four choices per question. 25 of the questions are scored and 10 of the questions are un-scored pilot questions. The pilot questions are randomly distributed throughout the examination and are not identified. All questions will be extensively reviewed prior to use and will receive additional regular evaluation for unforeseen bias during the course of their use in the exam.

Time Limit The time limit for the examination is one hour.