

COMPLETED

NLCAA

National Lighting Contractors Association of America

3301 East Hill Street, #406 | Signal Hill | California | 90755
877.341.0040 www.nlcaa.org

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5504

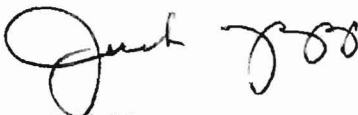
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| California Energy Commission DOCKETED 13-ATTCP-01 TN # 72485 1-10-14 |
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Regarding submittals to becoming an Acceptance Test Technician Certified Provider
(docket # 13-ATTCP-02)

This letter is a request from National Lighting Contractors Association of America to the California Energy Commission to become a Lighting Control Acceptance Test Technician Certified Provider. We have submitted the required information and attaching the ATTCP application and Application For Confidential Designation.

We have submitted our curriculum binders to the Docket Unit

Sincerely,



Jack Yapp
Vice President



NATIONAL LIGHTING CONTRACTORS ASSOCIATION OF AMERICA
LIGHTING ATTCP APPLICATION

- I. Document Organizational Structure [10-103-A(c)1]
 - A. Organization type – **Non-profit**
 - B. By-laws – **attached (Section 1 of binder 1)**
 - C. Ownership structure – **Non-profit**

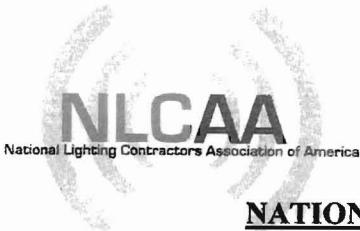
- II. Certification of Employers [10-103-A(c)2]
 - A. Training – **Eight- hour training for Contractors**

| Overview of Lighting Controls and Title 24 Part 6 Lighting Controls | Requirements |
|--|---------------------|
| Review Lighting Controls | LCA Online Classes |
| Title 24 Review Acceptance Test Tech Responsibility | NLCAA Class |
| Review of Compliance Certificate, Installation Certificates, and Acceptance Certificates | NLCAA Class |
| Historical education of the California Lighting Control Acceptance Test Regulations | NLCAA Class |
| Value Propositions of becoming a Lighting Control Acceptance Test company | NLCAA Class |

- B. Oversight – See Attached contractors oversight

Contractors will fill out the acceptance report and are required to submit copies of the actual acceptance to NLCAA for recording and post review.

- III. Training and Certification Procedures for Technicians [10-103-A(c)3A, B, and C]
 - A. Copy of all training and testing procedures, manuals, handbooks and materials
See Attached Training Manuals
 - B. Must include theoretical and hands-on experience for all Acceptance Tests (including compliance documentation and registration) Pictures of hands-on material covering
 - **Line voltage wiring**
 - **Low voltage wiring**
 - **Occupancy Sensors**
 - **Time switches and Programming Astronomical Clocks**



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• **Dimming controls 0-10 vdc**

- **Photo sensors**
- **Wireless controls**
- **Lighting Controls Systems**
- **Demand response controls**

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C. Curricula most cover topics in §10-103-A(c)3B(i)

Topics covered in our Training Manual

D. Prequalification criteria – **Student must prove that they have a minimum of 3 years of lighting controls and electrical system background.**

IV. Complaint Procedures [10-103-A(c)3D]

- A. Must be able to receive, process/investigate, and respond to complaints (phone, internet, mail, etc.) regarding the performance of their certified technicians and employers. **Complaint forms (See Section 2 of binder 1) Complaint forms are posted on our website**

V. Revocation Procedures [10-103-A(c)3E]

- A. Should establish disciplinary procedures that are provided to all technicians and employers that: define potential violations, possible disciplinary action for each infraction, implementation time lines, and hierarchy of disciplinary process for repeat offenders or fraudulent actions. **Complaint Procedure (See Section 2 of Binder 1)**

VI. Quality Assurance Program [10-103-A(c)3F]

- A. Quality Assurance
(See section 3 Binder 1 flow chart as to procedure on verification)
- B. Independent Oversight
(See section 3 Binder 1 flow chart as to procedure on verification)
- C. Accountability Measures
- D. QA program should include:
- i. Field verification and documentation verification
(See section 3 Binder 1 flow chart as to procedure on verification)
 - ii. Each technician being QA'd once every year
(See section 3 Binder 1 flow chart as to procedure on verification)
 - iii. Each acceptance being QA'd once every year
(See section 3 Binder 1 flow chart as to procedure on verification)

- VII. Certification Identification Number and Verification of ATT Status [10-103-A(c)3G]
- A. Must assign #, according to “standardize “ format agreed upon between CEC and providers
- Proposed Number and Verification of ATT Status
- **Assigned number ATT-13-00001 (13 represents year)**
- B. Must make listing of certified technicians, their ATT #, and their certification status readily available to the public (e.g. searchable list on website)
- **Listed on our website as a certified technician**
- VIII. Annual Reports [10-103-A(d)]
- A. # of Technicians and Employers certified for the year (reporting period and total “to date”)
- **End of year report indicating the names, number, of Technicians and Employers**
 - **Software program will list the names, number , of Technician and Employers that will be accessible to the CEC in real time.**
- B. Adjustments to the training curricula in response to amendments of existing Standards or adoption of new Standards, or to reflect the variety of lighting controls used in the field
- **Update amendments of Standards or adoption on new Standards and update of approved new lighting controls will be updated to our software when approval are in place**
- C. “Real time” access to a data registry/server would be optimal
- Instant access to data registry via our software**



APPLICATION FOR CONFIDENTIAL DESIGNATION

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

6304 East Hill Street, #406 | Signal Hill | California | 90755
877.341.0040 www.nlcaa.org

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.

APPLICANT: National Lighting Contractors Association of America

ADDRESS: 3301 E. Hill Street Suite 406-408 Signal Hill, CA 90755

- 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.**

National Lighting Contractor Association –(1) Lighting Controls Acceptance Testing Manual (764 Pages) NFPA 70E Electrical Safety in the Work Place

Software The software was designed to simplify the documentation and eliminate paper work as well as eliminate the acceptance tester math calculation. It is provided to the CEC staff for review as an acceptable method for documentation of acceptance testing and part of quality assurance. The software will be accessible by the CEC to review any acceptance testing performed by acceptance test technician that signs up for the service. The information resides in our server located at our school.

Section 29 of our binder which is our software manual and part of our application

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

Both Binders which were submitted to the Docket Unit

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

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.

How it would be lost. Our curriculum was developed over a number of years based on following the changes in the energy codes as well as changes in technology. If our curriculum was to be reviewed by other than CEC it might be duplicated.

Value of information to the applicant. The value for the information exceeds \$150,000.00

Ease or difficulty with which the information could be legitimately acquired or duplicated. Competitors reviewing our curriculum can duplicate all or part of our curriculum. Regarding our software it can be duplicated with some difficulty

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.

Information can be disclosed if it is aggregated with other information or masked to conceal certain portions

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.

Portion of the course is presented to our existing students



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: January 3, 2014

Signed:

Name (print or type) Jack Yapp

Title: (print or type) Vice President

Represent National Lighting Contractors Association of America__

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



California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5504

January 17, 2014

Regarding submittal to becoming an Acceptance Test Technician Certified Provider

(docket # 13-ATTCP-02)

This is a revised letter from National Lighting Contractors Association of America to the California Energy Commission to become a Lighting Controls Acceptance Test Technician Certified Provider. We have previously submitted our curriculum binders and now attaching the following:

1. ATTCP Application
2. Confidential Designation
3. Acceptance Test Technicians Training Employers Course one-binder and Qty. 4- CDs of same material
4. Acceptance Test Technicians Training Manual Qty. 3-CDs of the same material

Please send your check as soon as possible so that we can stop the computer's collection letter sequence and avoid annoying you needlessly.

Sincerely

A handwritten signature in black ink, appearing to read "Jack Yapp". The signature is fluid and cursive, with a small flourish at the end.

Jack Yapp
Vice President



APPLICATION FOR CONFIDENTIAL DESIGNATION
(Title 20 Cal. Code. Regs., § 2505 et seq.)

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TITLE Lighting Controls Acceptance Testing Manual

DATE: December 11, 2013

DESCRIPTION:

1. Lighting Control **Acceptance Testing Manual** covers all the material that will be providing to training and certification of Acceptance Test Technicians.
The manual is 764 pages long and there are 31 sections in two binders
2. Lighting Control Acceptance Test Technician **Acceptance Test Technician Employer Course** with 394 pages

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

1. **Acceptance Testing Manual** The binders submitted we are requesting Sections 1 through 18 and Section 23 to 31 to be confidential designated

Sections omitted from Confidential Designation are Section 19, 20, 21, and 22 these section are NFPA70E Electrical Safety in the Workplace



2. Acceptance Test Technician Employer Course The binder submitted we are requesting Sections 1- 2 and 4 to be confidential designated

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

Keep it confidential until our curriculum is accepted

- 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.

The California Public Records Act allows for the non-disclosure of trade secrets. (Gov. Code, §§ 6254(k), 6276.44; see also Evid. Code, § 1060.)

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How it would be lost. Our curriculum was developed over a number of years based on following the changes in the energy codes as well as changes in technology. If our curriculum was to be reviewed by other than CEC it might be duplicated and we would loose our competitive advantage..

Value of information to the applicant. The value for the information exceeds \$150,000.00

The difficulty with which the information could be legitimately acquired or duplicate, the training material we developed is not available by any other organization. It would take significant time and money to develop a similar program.

- 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.

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Dated: January 13, 2014

Signed:

Name (print or type) Jack Yapp

Title: (print or type) Vice President

Represent National Lighting Contractors Association of America

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| Review of Compliance Certificate, Installation Certificates, and Acceptance Certificates | NLCAA Class |
| Building Energy Efficiency Standards (BEES) | NLCAA Class |
| Final Examination | NLCAA Class |
| | |

- B. Oversight – See Attached contractors oversight

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