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California Energy Commission

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Tav Commins
California Energy Commission
1516 Ninth Street
Sacramento, California 95814
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RE: Comments on CALCTP Lighting Control Acceptance Test Technician Certification Provider Application

I am writing in regard to the California Advanced Lighting Controls Training Program's application to be approved by the California Energy Commission as a Lighting Control Acceptance Test Technician Certification Provider. I have supported the Commission's efforts to develop a certification program to ensure that acceptance tests are performed by qualified, trained personnel. However, for certification to be worthwhile, the Commission must ensure that it holds the certification providers to the highest standards feasible.

I urge the Commission to ensure that provider applications are sufficiently detailed and rigorous to demonstrate a strong likelihood for success. In particular, I am concerned about four aspects of a provider's program: (1) ensuring the provider has sufficient experience, reputation and qualifications to demonstrate a likelihood of success; (2) ensuring certification applicants have three years of relevant, verified professional experience in lighting controls; (2) ensuring training covers all necessary topics and testing is validated for subject matter and bias; and (3) ensuring that providers require and implement rigorous quality assurance procedures to ensure a high level of performance and reliability.


The CALCTP application demonstrates that it meets these concerns. Accordingly, I support the full approval of CALCTP as a Lighting Control Acceptance Test Technician Certification Provider.

While I support approval of CALCTP's application, I believe that the prequalification requirements for approval should be even more rigorous than allowed by CALCTP. Acceptance testing training necessarily builds upon the knowledge and experience base possessed by electrical professionals. There are dozens of different lighting control manufacturers, hundreds of different advanced lighting control products and thousands of different configurations for these systems. Just because a non-electrician has experience in some of these systems does not mean that they are qualified to be trained as a lighting control acceptance tester. Even if they were able to

successfully pass certification, most persons without any previous experience in electrical and lighting systems would be unable to effectively apply this training in complex real world situations.

Accordingly, participation in the certification program should be limited to persons who are certified general electricians or who have other equivalent verifiable professional experience and training in designing or installing lighting and electrical systems, such as electrical engineers. To ensure effective acceptance testing, it is critical to ensure that acceptance testers have the underlying background and experience in these systems to be able to adjust to the complexities and permutations that a tester will encounter out in the field.

Sincerely,



Kirk Story
Principal, Operations Director
Stockman's Energy, Inc.