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The VOICE of the Construction Industry

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April 15, 2015

Commissioner Andrew McAllister
California Energy Commission
1516 Ninth Street, MS-34
Sacramento, CA 95814

California Energy Commission

DOCKETED

13-ATTCP-01

TN 76007

JUN 30 2015

Re: Request for Public Workshops to Discuss Marketplace Readiness for Title 24 Acceptance Testing Technician Requirements Prior to CEC Determinations Pursuant to Section 10-103(B)(b)

Dear Commissioner McAllister:

Associated General Contractors of California (AGCC) has been the voice of the construction industry since 1920. We are an organization of construction firms and industry-related companies committed to improving our physical environment through our commitment to the principles of Skill, Integrity and Responsibility. We represent over 1,000 contractors, specialty, and associate member companies throughout California.

I write on behalf of AGC of California in regard to the process by which the California Energy Commission (CEC) will follow in making determinations pursuant to the 2013 Building Energy Efficiency Standards Section 10-103(B)(b) mandating the use of certified Acceptance Test Technicians (ATTs) employed by Acceptance Test Employers (ATE).

Specifically, AGC of California respectfully request the CEC to consider a public workshop to discuss: 1) reasonable access to ATT and ATE certification for HVAC installers, mechanical contractors and testing and balance contractors; and 2) the mechanical acceptance testing needs of the non-residential construction industry, including but not limited to, the actual number of technicians available to contractors, geographical coverage of those technicians, projected costs to prepare and submit forms to the registry and general marketplace readiness.



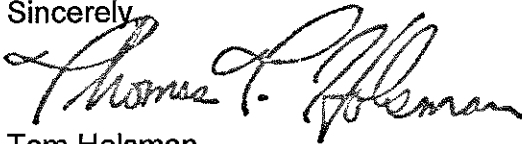
In support of the 2013 energy efficiency building standards, AGC of California is pleased to hear that the National Energy Management Institute Committee (NEMIC) in coordination with the Testing, Adjusting and Balancing Bureau (TABB) has been conditionally approved by the CEC as the first mechanical Acceptance Testing Technician Certification Program (ATTCP) in the state.

While NEMIC is ramping up their certification program, we think a public workshop may help CEC gather important information from the non-residential HVAC industry and other stakeholders to better evaluate the total number of ATTs and ATEs needed to address the volume of acceptance testing in non-residential construction.

Building owners, general contractors, construction managers and subcontractors all share a common desire for the adequate supply and availability of ATTs in this state to provide timely and cost-effective testing services. It is widely understood that a shortage of ATTs could result in construction delays, potentially higher prices for testing services and or negative public pressure on Title 24 requirements altogether.

The AGC of California welcomes the opportunity to work with the California Energy Commission to discuss marketplace readiness for Title 24 acceptance testing technician requirements.

Sincerely,



Tom Holsman
CEO
AGC of California

