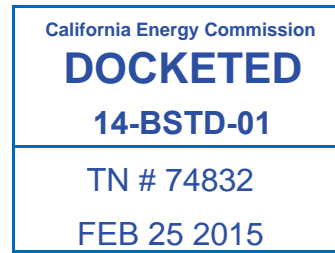


Via Email

California Energy Commission
Docket No. 2014-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov



Re: Registration of Certificates of Acceptance

Dear Docket Office:

There are currently no requirements for Acceptance Test Technicians (ATT) to submit documentation to the Acceptance Test Technician Certification Provider (ATTCP) to which the ATT is certified. Therefore, an ATT can complete an acceptance test and submit Certificates of Acceptance to the Building Department without the ATTCP having any knowledge of work completed by their ATTs.

For quality assurance, NLCAA recommends that all Acceptance Test Technician Certification Providers be required to serve as registration providers in accordance with the applicable requirements in Reference Appendix JA-7. Specifically, the following requirements:

JA7.6.2.2.6 Document Retention

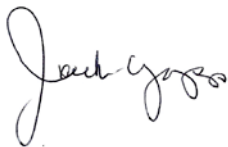
The Acceptance Test Technician Certification Providers shall retain a copy of the completed registered electronic Certificate of Acceptance.

JA7.5.4.1 Nonresidential Registration Numbering Convention

... The nonresidential registration numbering convention specification shall use a similar design concept as used in the residential registration numbering convention specified in Section JA7.5.4.2...

Thank you for your consideration of this submission.

Sincerely,



Senior Vice President of NLCAA