

## DOCKETED

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*Comment Received From: mscalzo@nlcaa.org*

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**NLCAA comments 7-18-2017 ATTCP Requirements Presentation**

*Additional submitted attachment is included below.*



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NLCAA comments on 7-18-2017 ATTCP Requirements Presentation

1. **Sections 10-103.[1,2](b): Threshold Maintenance**
  - a. No comment
2. **Sections 10-103.[1,2](c)3B and G: Decertified ATT Restrictions**
  - a. NLCAA supports this measure change for Lighting ATT's.
3. **Sections 10-103.[1,2](c)3B(vi): Recertification Training Curricula**
  - a. NLCAA has concerns over any requirements for hand-on training for re-certification, this will create a cost impact to the ATT, ATE and ATTCP which could increase the cost of the testing procedures to the entity paying for the testing services. New ATT testing procedures could be demonstrated as they are currently, through on-line training, this has been a successful process during this last code update.
4. **Sections 10-103.[1,2](c)3G: Recertification Status**
  - a. NLCAA supports this measure change for Lighting ATT's.
5. **Sections 10-103.[1,2](c)3F: Quality Assurance**
  - a. NLCAA supports this measure for Lighting ATT's.
  - b. NLCAA feels that the field audit process of Lighting ATT's should allow for onsite audits during the testing procedures of a project. This is the best time to review the performance of the ATT's to ensure that the proper procedures are being followed and this also becomes a great opportunity for the evaluator to mentor the ATT.

*"Quality Assurance and Accountability. The ATTCP shall describe in their application to the Energy Commission how their certification business practices include quality assurance and accountability measures, including but not limited to independent oversight of the certification processes and procedures, visits to building sites where certified technicians are completing acceptance tests, certification process evaluations, building department surveys to determine acceptance testing effectiveness, and expert review of the training curricula developed for Building Energy Efficiency Standards The ATTCP shall review a random sample of no less than 1 percent of each Technician's*



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*completed compliance forms, and shall perform randomly selected on-site audits of no less than 1 percent of each Technician's **completed** acceptance tests. Independent oversight may be demonstrated by accreditation under the ISO/IEC 17024 standard."*

**6. Sections 10-103.[1,2](d)1: Annual Reports**

a. NLCAA supports this measure change for Lighting ATT's.

**7. Sections 10-103.[1,2](d)2: Update Reports**

a. NLCAA supports this measure change for Lighting ATT's.

**8. Section 10-102: Abbreviations**

a. NLCAA supports this measure change for Lighting ATT's.

**9. Section 10-102: ATTCP Definition**

a. NLCAA supports this measure change for Lighting ATT's.

**10. Sections 10-103.[1,2]: Grammatical Corrections**

a. NLCAA supports this measure change for Lighting ATT's.

**11. Sections 10-103.[1,2](a): ATTCP Scope**

a. NLCAA supports this measure change for Lighting ATT's.

**12. Sections 10-103.[1,2](c)3F: Quality Assurance**

a. NLCAA supports this measure change for Lighting ATT's.

**13. Sections 10-103.[1,2](c)3G: ATE Certification ID Numbers**

a. NLCAA supports this measure change for Lighting ATT's.

**14. Sections 10-103.[1,2](f)1A: Nonsubstantive Application Amendments**

a. NLCAA supports this measure change for Lighting ATT's.

Thank you for the opportunity to comment.

Michael Scalzo  
Executive Director  
NLCAA