

DOCKETED

Docket Number:	17-BSTD-02
Project Title:	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
TN #:	223314
Document Title:	Finlay Drake Comments SECTION 120.8 â€“ NONRESIDENTIAL BUILDING COMMISSIONING
Description:	N/A
Filer:	System
Organization:	Finlay Drake
Submitter Role:	Other Interested Person
Submission Date:	5/2/2018 3:59:39 PM
Docketed Date:	5/2/2018

Comment Received From: Finlay Drake

Submitted On: 5/2/2018

Docket Number: 17-BSTD-02

SECTION 120.8 – NONRESIDENTIAL BUILDING COMMISSIONING

To whom it may concern,

This comment is regarding 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking for section 120.8 - Nonresidential Building Commissioning. Our firm, Drake Integrations, would like to show support for the earlier comments provided by KW Engineering and the Building Commissioning Association submitted on 12/18/2017 under docket # 17-BSTD-01. The recommendation was to amend the 120.8 code to require that commissioning work for buildings over 50,000 square feet or with a complex mechanical system be performed by third party ANSI accredited certified commissioning professional. To ensure the proper execution of the commissioning requirements outlined in section 120.8 and to improve the overall energy efficiency of new or existing construction projects, it must be clearly defined who is qualified to perform this service. This type of language is not new in the commissioning industry as the military already specifically defines what a qualified commissioning firm entails in the attached UFGS 01 91 00.15 code - Total Building Commissioning:

Section 1.6.1. Lead Commissioning Specialist:

The Commissioning Firm must provide a Lead Commissioning Specialist (Cx) that has a minimum of five years of commissioning experience, including two projects of similar size and complexity, and that is one of the following: a NEBB qualified Systems Commissioning Administrator (SCA); ACG Certified Commissioning Authority (CxA); ICB/TABB Certified Commissioning Supervisor; BCA Certified Commissioning Professional (CCP); AEE Certified Building Commissioning Professional (CBCP); University of Wisconsin-Madison Qualified Commissioning Process Provider (QCxP); ASHRAE Commissioning Process Management Professional (CPMP).

As a leader in the United States for energy efficiency policy, it would be in California's best interest to champion the requirement of ANSI certified commissioning firms to ensure a complete and effective commissioning process and that the desired Title 24 energy benefits are obtained. Commissioning is more than just testing a system and signing a piece of paper. It is a systematic process to ensure a building is designed, installed, and functioning based on the Owner's Project Requirements, Basis of Design and Title 24 energy code. It is a collaborative effort to ensure building owners have the tools necessary to maintain the great benefits of Title 24 after the project is signed off. It is the use of a third-party representative to provide the proper checks and balances on subcontractors to ensure the best interest for the Owner and the State, preventing the unethical and ineffective practice of performing quality control on your own work. You would not allow a non-licensed professional to design or construct a building in California and you should not allow just anyone regardless of credentials or conflicts of interest to commission a building. The State is already enforcing certifications when it comes to Lighting and Mechanical Acceptance Testing, so it should seem obvious that Commissioning under 120.8, where there are multiple nationally recognized ANSI accredited bodies backed by the Department of Energy, would also be held to the same professional requirements. The non-acceptance of the comments from kW and BCxA is a step backwards and missed opportunity in enforcing a well-thought out code requirement in 120.8, which unfortunately in reality is proving to be lackluster in its execution and impact.

Finally, the exception for functional performance testing under Section 120.8(g): Healthcare facilities, seems unacceptable in an industry where Legionnaires' disease is a constant concern and easily preventable by proper maintenance and functional testing of a system, not to mention the benefits of proper indoor air quality on a patient's health. Please reconsider your motives on this exception.

Respectfully,
Finlay Drake