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February 24, 2012

California Energy Commission
1516 Ninth Street, MS-31
Sacramento, CA 95814

Re: Docket # 10-BSTD-01

Subject: Building Energy Efficiency Standards Acceptance Testing and Documentation
OPPOSE LIMITING QUALIFIED PERSONNEL TO ONLY AABC, TABB and NEBB CERTIFIED INDIVIDUALS OR FIRMS

Dear Commissioners:

My name is David Lawson and I am the Vice President of Lawson Mechanical Contractors, a California mechanical contracting company that has been in business for over sixty years.

I am a member of the Sheet Metal and Air Conditioning Contractors National Association (SMACNA) and write to clarify that I ***oppose*** any proposal to narrow or limit the responsibility for acceptance testing and documentation to *ONLY* those individuals and companies who are certificated by the Associated Air Balance Council (AABC), National Environmental Balancing Bureau (NEBB), the Testing Adjusting and Balancing Bureau (TABB).

Clearly, acceptance testing and documentation under the 2013 Title 24 Energy Efficiency Standards for non-residential structures will require highly trained individuals to perform the work. Whether or not certified by AABC, NEBB or TABB, all licensed mechanical engineers and licensed mechanical contractors who are installing contractors, start-up contractors, or service contractors are highly qualified and should be allowed to serve as acceptance testing Field Technicians for HVAC equipment and controls. Additional training and/or certification should be available to all these individuals as necessary.

This more inclusive approach will ensure highly qualified individuals are performing the work while achieving full and cost-effective compliance with Title 24 in non-residential structures.

Finally, I strongly support creating a place on the Title 24 acceptance forms to clearly identify the responsible party. This will increase accountability and compliance.

Thank you for your consideration of my concerns.

Sincerely,

LAWSON MECHANICAL CONTRACTORS

David Lawson, Vice President