



February 24, 2012

**California Energy Commission**  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

<b>DOCKET</b>	
<b>10-BSTD-01</b>	
DATE	FEB 24 2012
RECD.	MAR 02 2012

**Re: Docket No. 10-BSTD-01**

Dear Commissioners:

This letter addresses a request by SMW Local 104 to support a regulation providing that T-24 Acceptance Testing Forms for commercial HVAC buildings be signed off by AABC, NEBB and/or TABB Certified technicians. We object to this restrictive policy because there are a number of other very qualified parties that should also be authorized by the regulation to sign off on these forms.

For example, our firm employs in-house registered professional engineers that are imminently qualified to act as signers on the acceptance forms. In addition, licensed contractors and commissioning agents have the requisite knowledge and experience as well.

The work that needs to be performed for the various acceptance forms are as follows:

- Ventilation Systems – VAV and CAV
- Constant Volume, Single Zone, Unitary A/C and Heat Pumps
- Air Distributions systems
- Air Economizer controls
- Demand Control Ventilation
- Supply Fan Variable Flow Controls
- Valve leakage test
- Supply Water Temperature reset
- Hydronic system variable flow control
- Automatic Demand shed control acceptance
- Fault detection and diagnostics for DX units
- Automatic fault detection and diagnostics for air handling and zone terminal units.



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- Distributed energy storage DX AC Systems testing
- Thermal Energy System storage.

As you can see, many of these tests are not limited to test and balance technician work. Most of this work is done by Sheet Metal, UA and Control systems technicians and during performance the work is witnessed and reviewed by both contractors, engineers and commissioning agents.

Thank you for considering our comments and suggestions.

Sincerely,

Phillip C. Phillips

A handwritten signature in blue ink, appearing to read 'Phillip C. Phillips', is written over the printed name. The signature is fluid and cursive, with a long horizontal stroke at the end.

Vice President / Operations  
Southland Industries