February 1, 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

Dear Commissioners,

My name is Brian Elliott. I am the Chairman, CEO and owner of Anderson and Howard Electric, Inc. Anderson and Howard Electric have been in business since 1965. As you are aware, lighting is one the state's largest annual consuming end uses and a critical contributor to peak load. The lighting industry has done a reasonable job of replacing inefficient lamps and ballasts with more efficient equipment. However, one of the greatest potentials for significant gains in energy efficiency has been largely missed, which is the deployment of lighting control systems that turn off or dim indoor and outdoor lighting. Overall, the lighting industry has a less than acceptable record of consistently providing high quality installations that achieve the optimum performance levels necessary to successfully deal with the peak load and demand issues. This can be attributed to the extremely complex and technical nature of advanced lighting controls.

We request that the Building Energy Efficiency Standards 2013 Edition require all advanced lighting control related acceptance testing and documentation to be performed by California state certified general electricians who are also certified by the California Advanced Lighting Controls Training Program (CALCTP), and who are performing the work while employed by a California licensed C-10 electrical contractor who holds a CALCTP contractor certification.

These acceptance tests require skills that are not commonly found in the industry, but which are mastered in the 60 hours of CALCTP training and certification. To be eligible to enter CALCTP, candidates must be state certified general electricians. CALCTP consists of a very vigorous curriculum designed by California utilities, the California Lighting Technology Center at U.C. Davis, and electrical industry master instructors. The training includes 40 hours of hands-on labs which require a 100% pass rate for graduation, and lectures followed by a comprehensive and demanding final exam. According to an extensive study by the CPUC, published as the California Workforce Education & Training Needs Assessment for Energy Efficiency, Distributed Generation, and Demand Response 2011, "CALCTP presents a model for future IOU workforce planning and sector strategies for the deployment of new clean energy measures and initiatives."

As an employer, I believe this requirement is the most cost-effective method available to ensure advanced lighting systems are performing at their peak efficiency. Thank you for your consideration of this request.

Sincerely,

Brian D. Elliott
Chairman/CEO
Anderson and Howard Electric, inc.

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