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January 19, 2012

Commissioner Karen Douglas
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 Commissioner Douglas:

As Legislative stakeholders, we write to you today to encourage the Commission to include in the 2013 Standards Update a requirement to ensure that acceptance testing and documentation for HVAC and advanced lighting controls is performed by technicians who have the appropriate training and expertise to ensure the accuracy and reliability of this information. Without such assurances, the Commission's acceptance testing and documentation requirements merely impose a costly administrative burden on builders without any assurance that this burden will result in actual benefits and savings.

The Commission has repeatedly found the need for appropriate training and certification for both HVAC and lighting controls in order for California to realize its energy efficiency goals. Recently the California Commissioning Collaborative, made up of diverse interests within the energy and utility sector, concluded that code officials, contractors and engineers are not clear on the acceptance testing procedures and form documentation requirements. These forms are very technical and require the tester and documenter to be intimately familiar with both installation and testing and balancing of these systems.

In other words, if we want to confirm that the energy efficiency targets are in fact being realized, we need to ensure that those individuals performing this critical testing and certification work are properly trained and certified. Fortunately, widely-accepted national and statewide training and certification programs already exist that provide the level of experience and expertise necessary to ensure accurate and reliable acceptance testing and documentation. Because these certification programs are already in place and workers and contractors with these certifications are widely available, the 2013 Energy Efficiency update can include these requirements without additional costs to building commissioning and without the need to "reinvent the wheel" to develop certification programs.

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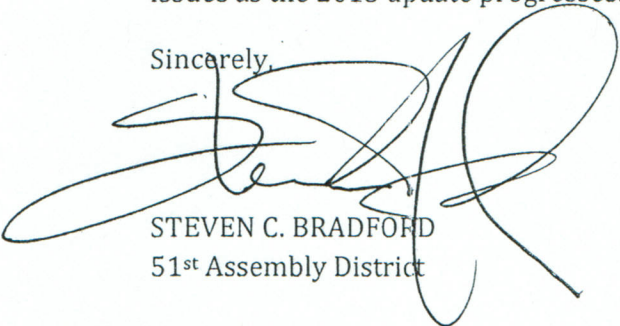
For HVAC systems, we support the Commission requiring all HVAC related acceptance testing and documentation be performed by testing, adjusting, and balancing (TAB) technicians certified by the Associated Air Balance Council (AABC), National Environmental Balancing Bureau (NEBB) or the Testing Adjusting and Balancing Bureau (TABB) and who are employed by a AABC, NEBB or TABB certified contractor. As you may know, TAB technicians go through a 5 year apprenticeship (equivalent to a bachelors degree) followed by a two year (masters studies) intensive building systems theory course.

For lighting controls, we support the Commission requiring all advanced lighting control related acceptance testing and documentation to be performed by California state certified general electricians who are certified by the California Advanced Lighting Controls Training Program (CALCTP), and who are employed by a California licensed C-10 electrical contractor that holds a CALCTP contractor certification. As you know, CALCTP is an award winning, industry-wide public/private non-profit training and certification collaborative which includes a diverse set of stakeholders including the Commission, all three investor-owned utilities, U.C. Davis, and California Community Colleges. 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 rigorous curriculum and includes 40 hours of hands-on training in labs which require a 100% pass rate for graduation, and lectures followed by a comprehensive and demanding final exam.

It is worth emphasizing that the training and certifications mentioned above are widely acclaimed and do not favor union or non-union workers.

Thank you for your consideration of this request. We look forward to working with you on these issues as the 2013 update progresses.

Sincerely,



STEVEN C. BRADFORD
51st Assembly District