



Industrial - Commercial - High Voltage - Low Voltage Systems

January 31, 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 Ryan Herzog. I am the President of MB Herzog Electric, Inc., a 35-year, family owned electrical contracting and engineering business.

As you know, lighting is one of the state's largest annual consuming end use and critical contributor to peak load. The lighting industry has done a reasonable job of replacing inefficient lamps and ballasts with more efficient equipment. Given that, one of the greatest potentials for gains in energy efficiency is through 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. One of the reasons is due 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 "The 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,

Ryan Herzog, President

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