

March 2, 2012

California Energy Commission  
1516 9<sup>th</sup> St  
Sacramento CA 95814

*Via Email*

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

RE: Docket number 10-BSTD-01 Proposals For Certification of Acceptance Testing Field Technicians For Mechanical Systems and Lighting Controls

Dear Commissioners:

I encourage you to oppose Docket number 10-BSTD-01 Proposals For Certification of Acceptance Testing Field Technicians For Mechanical Systems and Lighting Controls. This proposal is unnecessary.

This proposal is another effort by the IBEW/NECA to further control the marketplace. A result of that would be limiting the number of people or firms permitted to perform tests, further resulting in increased costs and reducing the effectiveness of the tests. This proposal would prohibit engineers, commissioning agents and electrical contractors from performing testing they are qualified to conduct (and have historically been conducting).

Questions such as the following need to be answered regarding the current proposals:

What is the problem or issue this proposal is intended to fix, what is broken in the current regulation?

Will these proposed union sponsored programs certify open shop contractors, or non union electrifications and engineers?

What is an Owner, Contractor or Engineer to do if only union contractors perform testing and the union contractor refuses to come on the project site or certify work not performed by a union contractor?

Please oppose Docket number 10-BSTD-01 it restricts free and open competition by excluding qualified people from performing the work.

Sincerely,

  
Ken Kreischer  
Western Water Constructors, Inc.