



March 5, 12

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

<b>DOCKET</b>	
<b>10-BSTD-01</b>	
DATE	MAR 05 2012
RECD.	MAR 05 2012

Re: Docket # 10-BSTD-01

Collective Written Responses to Questions Brought Forth at the February 27, 2012 Workshop  
Submitted by Erik S Emblem, Executive Administrator  
Joint Committee on Energy and Environmental Policy

1) Do the proposed certifications train or test to the Title 24 acceptance tests and forms?

When reviewing the Non-Residential Compliance Forms there is nothing outside of the knowledge base scope required of a certified TAB technician. It is more a matter of getting the correct data then knowing where to input the results on the forms.

2) Does the proposal create a monopoly? Should certification be limited only to TABB, AABC, NEBB and CALCTP or should it be open to other certifications (i.e., certification of commissioning agents, UC-Berkeley certification, etc.)?

Any organization that can prove to meet the same high standards of AABC, NEBB and TABB should be considered. Standards compared would include field experience, formal training, and examinations.

3) Is there a path for someone who just does verifications to be certified? What about third party certifiers?

AABC, NEBB and TABB organizations are not limited to anyone. If a technician is properly qualified they will have no problem passing the required exams.

4) Does this proposal prevent otherwise exceptionally qualified people from performing these tests?

No, if they are properly qualified they will not have any trouble passing the exams.

(Cont.)



**(5) What about engineers?**

**If engineers are properly qualified they will not have any trouble passing the exams. Furthermore AABC, NEBB and TABB recognize an engineer's formal training in the application process.**

**(6) What about unique, complicated systems where an installer may have specialized knowledge that makes him or her most qualified to perform the tests?**

**Since AABC, NEBB and TABB certified technicians have a complete system understanding they have an advantage. A certified TAB technician can pull from that knowledge base and apply it to any piece of equipment. Much like when performing general testing, adjusting and balancing (TAB), certified TAB technicians commonly work with specialist to complete the required tests. However, it would be the certified TAB technician who is responsible for accurately reporting the test results and verifying the legitimacy of the functional tests.**

**(7) Is their sufficient availability of certified technicians to allow compliance with this requirement?**

**Based on the figures presented at the CEC workshop, regarding estimated numbers of equipment installed per year, there would be 8.34 pieces of new equipment requiring acceptance forms, per certified TAB technician, per month.**

**Reviewing historical data of the growing numbers of certified TABB, NEBB, and AABC technicians, the amount of certified TAB technicians is expected to double by 2014.**

**(8) (Statement) It is not clear to us where the need for a generic certification falls into this scheme of things – there are too many variables to make this approach reasonable and prudent.**

**The assumption that the technician best suited for a particular test will be used is the status quo. The report, Evaluation of Title 24 Acceptance Testing Enforcement and Effectiveness, proved that the status quo is not working.**

**AABC, NEBB and TABB are three separate organizations, with high standards and a knowledge base that are best suited to fill out all of the forms. The certified TAB technician will be free to work with other specialized trades in completing the forms; however, the building inspector will now have one point of contact for verification purposes.**