

**DOCKETED**

<b>Docket Number:</b>	20-ATTCP-01
<b>Project Title:</b>	Mechanical Acceptance Test Technician Implementation Proceedings
<b>TN #:</b>	236896
<b>Document Title:</b>	Comments - Mechanical Acceptance Test Technician Implementation
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Dan Johnson, AIA
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/25/2021 12:04:06 PM
<b>Docketed Date:</b>	2/25/2021

*Comment Received From: Dan Johnson, AIA  
Submitted On: 2/25/2021  
Docket Number: 20-ATTCP-01*

**Comments - Mechanical Acceptance Test Technician  
Implementation**

*Additional submitted attachment is included below.*

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RE: Mechanical Acceptance Test Technician Implementation

Although the threshold for the number of accredited technicians statewide has been achieved, it's clear from the attached map of NEMIC technicians that they are clustered in the large metro areas. Most of the state has no access to Mechanical Acceptance Test Technicians (MATTs), if we look at a reasonable 30-mile travel radius. I think we can take the 305-member NEMIC registry (accessed 2/25/21) as a representative sample of all the accredited MATTs.

For example:

- A single technician in Yuba City is the northernmost NEMIC technician in the entire state
- A single technician in Bakersfield is the only registered NEMIC technician in the entire South-Central Valley
- The Central Coast has no NEMIC technicians
- A single technician in Hemet, over 50 miles from Palm Springs, is the closest NEMIC technician to entire climate zone 15 Mohave area of the state

To paint a picture of the implications, if I open a new gym in a disused storefront in Eureka, I will need to get a MATT from Yuba City (the closest NEMIC technician) to drive five hours each way to verify the outside air acceptance test. The only public transportation (aligned with the State's carbon goals) involves a trip first to the Bay Area, then a Greyhound to Eureka, a 13 hour trip one way.

Therefore, it appears the intent of the MATT program still cannot be executed outside the large metro areas. Based on the clustering of registered MATTs, it appears that further increasing the number of MATTs will not address the geographic inequity issue. The geographic inequity issue should be addressed head-on.

Thank you for considering these comments.

Kind regards,

Dan Johnson, AIA

**NEMIC-registered MATTs, accessed 2/25/21**

<https://www.google.com/maps/d/u/0/edit?mid=10EKi3qZnIPF4cZdRi85wUuvZHpk81zYh&usp=sharing>

