

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	237145
Document Title:	California Advanced Lighting Controls Training Program's Comments re Alternative to NDR Staff Report
Description:	N/A
Filer:	System
Organization:	California Advanced Lighting Controls Training Programs/Bernie Kotlier
Submitter Role:	Public
Submission Date:	3/11/2021 6:15:31 PM
Docketed Date:	3/11/2021

Comment Received From: Bernie Kotlier
Submitted On: 3/11/2021
Docket Number: 19-BSTD-03

Comments re Docket # 19-BSTD-03

Comments are attached in a MS Word document.

Additional submitted attachment is included below.

March 11th, 2021

The California Energy Commission
1516 Ninth Street, MS-4
Sacramento, CA 95814

Re: Docket Number: 19-BSTD-03, TN #236937, Comments on Alternative to NDR Staff Report

Dear Energy Commission Staff:

The California Advanced Lighting Controls Training Program (CALCTP) is a statewide nonprofit, public/private partnership dedicated to increasing the effectiveness, efficiency, convenience, and use of lighting controls in commercial, industrial, and institutional facilities. CALCTP educates, trains, and certifies C-10 licensed electrical contractors and state-certified general electricians in the proper installation, calibration, programming, commissioning, and maintenance of advanced lighting controls systems. CALCTP also trains and certifies acceptance test technicians.

CALCTP appreciates the opportunity to provide comments to the Commission on the California Energy Commission Staff Report on Nonresidential Data Repository for the 2022 Energy Code: Alternative to the Data Registry for Acceptance Test Technician Certification Providers (Report).

CALCTP agrees with the Report on an alternative to the Nonresidential Data Registry (NDR) as summarized in Table 6: Summary of Staff Evaluation of all Options. CALCTP is pleased that it addresses redundant charging concerns in addition to construction workflow, and data efficacy.

In addition, CALCTP concurs with the Commission staff recommendations relating to:

- a) ATTCPs should be required to submit monthly data transfer packets to the Commission CCCR as will be specified by the Commission.
- b) Implementing a proposal from the California Energy Alliance (CEA) to allow ATTCPs to submit data directly to the Commission CCCR and expand the authority of ATTCPs to collect and store nonresidential compliance documents relative to its area of expertise (i.e., currently limited to new installations of mechanical systems and lighting controls).

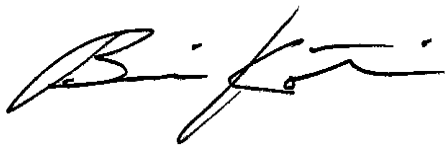
The above recommendations will address a redundant data reporting requirement that may raise costs as well as cause confusion.

While CALCTP agrees and supports numerous aspects of the Report, CALCTP has concerns in the following areas:

- a) First, in reference to language on page 24 of the Report: *“The API will be developed by the ATTCPs in cooperation with and approved by the CEC.”* CALCTP recommends that each ATTCP provide the Commission directly with documents and specified electronic data via an Application Programming Interface, or “API”. The Commission, as the central hub, will need to develop the API which will allow for consistency across all ATTCPs sending documents and data to the CCDR.
- b) Second, in reference to language on the chart on page 28 of the Report: *“The ATTCPs would require that the NRCCs be signed by an ATT relevant to the lighting controls or mechanical systems industry. The ATTCP already provides the necessary quality assurance to validate the accuracy of the compliance documents.”* CALCTP is in favor of having ATTs collect the relevant NRCCs and NRCIs. That said, because the ATTs are not licensed design professionals, ATTs should not be responsible for verifying the accuracy of the compliance documents. With this in mind, CALCTP would appreciate clarification from the Commission detailing the level of verification that is expected from the ATT when validating compliance documents. CALCTP supports ATTs verifying that the boxes and/or forms are checked correctly, but not that the design is compliant or correct.

Please contact me if you have questions regarding these comments. CALTP would like to thank the Commission for the opportunity to be heard and looks forward to continuing to work closely and collaboratively with you.

Sincerely,



Bernie Kotlier
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