

DOCKETED

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California Energy Commission
Docket Unit
13-ATTCP-01
1516 Ninth Street
Sacramento, CA 95814

Subject: CSPTC request to modify eligibility requirements for the 2019 Title 24 MATT certification

California Energy Commission,

This letter is to notify you that the California State Pipe Trades Council (CSPTC), an Acceptance Test Technician Certification Provider (ATTCP) in good standing, has reviewed our current eligibility requirements for Title 24 Mechanical Acceptance Test Technician (MATT) certification and requesting to modify those requirements in order to be able to more rapidly increase the number of certified ATTs available to serve the state. The proposed change is non-substantive because it continues to meet and exceed the regulatory minimum requirements for eligibility and does not result in any changes to the curriculum or training for standards for the 40-hour MATT certification training.

Under the 2016 CSPTC ATTCP application currently in effect, to be eligible for certification an applicant must be a member of the United Association (UA) who is classified as a journey worker, has successfully completed the five-year UA apprenticeship program, passed the United Association HVACR Star Exam and completed the following courses:

- Start, Test, and Balance
- Energy Audit
- GPRO- Green Professionals Trades Training

After careful review of the CSPTC eligibility requirements, we feel that the current program is unnecessarily restrictive and has had the unintended effect of excluding highly qualified journey workers that have completed a UA apprenticeship program prior to the implementation of the prerequisite classes or who became members of the UA as journeymen with more than five years of HVAC installation experience and thus are not graduates of the UA apprenticeship program. The CSPTC proposes to open eligibility to journeymen who fall into these classifications by allowing applicants to demonstrate their qualification to take the ATTCP certification course through passage of an ATTCP prequalification challenge exam in lieu of the

prerequisite classes. In addition, any UA journeyperson who is not a graduate of a UA HVACR apprenticeship program must have at least three years of work experience installing mechanical controls and systems as a UA journeyperson (for a total of eight years of experience). This will result in the following redlined change to page 5 of the CSPTC ATTCP Application:

Mechanical Acceptance Test Technician Eligibility

To be eligible for certification the UA member must be a journey worker who has satisfied one of the following indicators of professional experience and expertise:

A. _____ ~~s~~Successfully completed the UA apprenticeship program, ~~and~~ passed the United Association HVACR Star Exam, ~~and. In addition, a member must have~~ completed the following courses:

- GPRO – Green Professional Trades Training: A course designed to teach the people who build, renovate, and maintain buildings the principles of sustainability combined with knowledge of high-performance mechanical systems.
- Start, Test & Balance: A course designed to acquire the general knowledge and theory that is needed to properly use testing and measuring instruments in order to apply proper procedures to test, balance, and adjust mechanical systems.
- Energy Auditing Practices: A course designed to increase the skills and knowledge of the technician in order to improve the energy efficiency of any building without sacrificing comfort, health, or safety.

Satisfactory completion of the pre-requisite courses is defined as a passing score on each of the final exams.

B. _____ (1) Successfully completed the UA HVACR apprenticeship program; and (2) completed and passed the ATTCP prequalification challenge exam.

C. _____ (1) Documented at least eight years of experience installing mechanical controls and systems, including at least three years as a UA journeyperson; and (2) completed and passed the ATTCP prequalification challenge exam.

See Appendix C for: 1) Apprenticeship Curriculum; 2) Sample HVACR Star Exam Questions; GPRO Mechanical; 4) Start, Test & Balance; ~~4~~5) Energy Auditing Practices

Even with this change, the CSPTC prequalification requirements will remain among the most rigorous for any approved ATTCP. *The new standards will continue to greatly exceed the regulatory prequalification requirement that participation in the certification program shall be limited to persons who have at least three years of professional experience and expertise in mechanical controls and systems.*

Graduates of the UA HVACR apprenticeship program have at least five years of experience in mechanical controls and systems. In addition, CPSTC shall require their apprenticeship

graduates to have either taken the prerequisite classes listed in the existing application or to pass a prequalification challenge exam to confirm their expertise and knowledge is sufficient to prepare them to successfully take and apply the MATT certification training. UA members who have not graduated from an apprenticeship program must have at least five years of relevant work experience in order to be classified as a UA journey person. For those non-apprenticeship-graduate journey persons to be eligible to take the ATTCP certification training, CSPTC is requiring an additional three years of experience as a UA journey person (for a total of eight years of experience) and requiring passing of a prequalification challenge exam.

The CSPTC ATTCP pre-qualification challenge test consists of 45 questions extracted from the four prerequisite classes: UA HVAC Star Exam, GPRO, Start-Test and & Balance and Energy Audit. The questions used are the most relevant from each module to assess the experience and knowledge of the journeyworkers' readiness to take the 40-hour MATT certification training.

Because the proposed changes to the prequalification requirements continue to greatly exceed the regulatory requirements, this change is a non-substantive change for purposes of Energy Commission review. This eligibility amendment does not change or degrade the level of quality, accuracy, or performance of the Acceptance Test processes. In addition, there will be no changes to the substantive training standards for the 40-hour MATT certification training. The prerequisite courses being eliminated for experienced journeypersons do not cover any of the ATTCP curriculum required in Section 10-103.2. The required curriculum is contained entirely within the 40-hour MATT certification training which remains unchanged with this amendment.

We respectfully request Commission staff to process this amendment to our program at the earliest possible date in order to facilitate increasing the number of available MATTs as much as possible before the October 1st program mandate. We ask you take this request in consideration and approve by July 30, 2021 so that we have ample time to make our membership aware of the changes in time to hold certification classes between now and October 1st.

Respectfully Submitted,



Aaron Stockwell
Executive Director

Attachments: Redlined amended Application
Clean amended Application