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STAFF REPORT

Acceptance Test Technician Certification Provider Application Amendment Review for California State Pipe Trades Council

Review of Change to Training Prerequisites

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California Energy Commission

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ABSTRACT

Per the requirements in Section 10-103.2(f) of the Building Energy Efficiency Standards (codified in Title 24, Part 6, of the California Code of Regulations), acceptance test technician certification providers may submit an amendment to their approved application. Amendments submitted after approval of an application that contain any substantive changes are subject to the Application Review and Determination process specified in Section 10-103.2(e).

Staff has evaluated the amendment application that the California State Pipe Trades Council submitted September 15, 2021, and has determined that the proposed changes to the acceptance test technician applicant prerequisites outlined in the amendment satisfy the requirements in Section 10-103.2(c)3Biii of the 2019 Building Energy Efficiency Standards. Staff recommends approval of the California State Pipe Trades Council application amendment.

Keywords: Nonresidential mechanical systems acceptance test technician certification provider, California State Pipe Trades Council, acceptance testing, Building Energy Efficiency Standards

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EXECUTIVE SUMMARY

The acceptance test technician certification provider program provides training, certification, and oversight of acceptance test technicians, as well as the acceptance test employers. The technicians perform the tests required by California's Building Energy Efficiency Standards, and the employers are responsible for the technician's work. Providers are professional organizations that are approved to provide training curricula for technicians and employers, certification procedures, complaint resolution (including disciplinary procedures), quality assurance, and accountability measures. Acceptance testing ensures that installed equipment, controls, and systems in nonresidential buildings operate as required by the Building Energy Efficiency Standards.

Per the requirements in Section 10-103.2(f) of the Building Energy Efficiency Standards (codified in Title 24, Part 6, of the California Code of Regulations), acceptance test technician certification providers may change the conditions of their application by submitting an amendment for approval. Amendments that contain any substantive changes are subject to the full Application Review and Determination process specified in Section 10-103.2(e).

On June 16, 2016, the California State Pipe Trades Council was approved by the California Energy Commission (CEC) as a nonresidential mechanical systems acceptance test technician certification provider. The California State Pipe Trades Council submitted an amendment application to the CEC on July 21, 2021. Staff identified deficiencies and discrepancies in the application. The application was resubmitted for approval on September 15, 2021.

Staff evaluated the complete amendment application submitted by the California State Pipe Trades Council, and has determined that the proposed changes to applicant prerequisites outlined in the amendment satisfy the requirements for acceptance test technician applicants in Section 10-103.2(c)3Biii of the 2019 Building Energy Efficiency Standards. Staff recommends approval of the California State Pipe Trades Council application amendment.

CHAPTER 1:

Background

The Acceptance Test Technician Certification Provider Program

The acceptance test technician certification provider (ATTCP) program provides training, certification, and oversight of acceptance test technicians (ATTs) who perform the acceptance tests required by California's Building Energy Efficiency Standards (Energy Code), as well as the acceptance test employers (ATEs) that employ ATTs. ATTCPs are professional organizations that are approved by the California Energy Commission (CEC) to provide training curricula for ATTs and ATEs, certification procedures, complaint resolution (including disciplinary procedures), quality assurance, and accountability measures.

Acceptance testing ensures that installed equipment, controls, and systems in nonresidential buildings operate as required by the Energy Code. The ATTCP program was developed to improve compliance with Energy Code lighting controls and mechanical systems requirements.

California State Pipe Trades Council

On June 16, 2016, the California State Pipe Trades Council (CSPTC) was approved by the CEC as a nonresidential mechanical systems ATTCP. CSPTC is one of four organizations approved by the CEC as nonresidential mechanical systems ATTCPs.

CSPTC's amendment application was submitted under the 2019 Energy Code. Staff has determined that the proposed changes to applicant prerequisites outlined in the amendment satisfy the requirements for ATT applicants in Section 10-103.2(c)3Biii of the 2019 Energy Code. Staff recommends approval of the CSPTC application amendment.

ATT Applicant Prerequisite Changes

According to Section 10-103.2(c)3Biii, to be eligible to enroll in ATT training an individual must have at least three years of professional experience and expertise in mechanical controls and systems as determined by the mechanical systems ATTCP program. To maintain the highest level of technician competence, CSPTC established a more stringent list of prerequisites in their initial application. After the training program started it became apparent that many experienced candidates possessed a higher level of training and competence than required, but they could not enroll because they came by their experience or training in an unusual way due to a location or association change. This experience and training would not satisfy the original application requirements as written and would require these advanced candidates to re-enter the apprenticeship program to obtain the classes with the titles listed in the application.

The CSPTC ATT training program includes prerequisite requirements that must be completed by an applicant prior to enrolling in the ATT training program. All three of the following mandatory prerequisites must be met:

- Experience (completion of the apprenticeship program)
- Performance (passing the United Association [UA] HVAC Star Exam)

- Education (passing three named classes during the apprenticeship process)

The education prerequisite can potentially place an unintended burden on applicants coming from less common backgrounds. Existing journeymen workers that completed the apprenticeship program prior to the availability of the three named classes would be forced to re-enroll in apprenticeship school again, despite having demonstrated these skills for years. Journeymen who transfer to the UA from another union or who obtained journeymen status as non-union contractors would also be faced with the burden of re-entering apprenticeship school, even if they took similar classes with a different name.

To remove the barrier to these highly-qualified individuals but continue to guide new apprenticeship program students to the relevant classes, CSPTC proposes to add two additional prerequisite pathways to recognize the different educational equivalents that may be represented by prospective applicants (see paths B and C in Table 1).

Table 1: Staff Review of CSPTC Application Amendment (TN #238955-2)

Path	Experience Requirement	Performance	Education	Consistent with §10-103.2(c)3Biii
A Original application	5-Year UA Apprenticeship Program	UA HVAC Star Exam	"GPRO" class, "Start, Test & Balance" class, and "Energy Auditing Practices" class	Yes
B Newly defined path	5-Year UA Apprenticeship Program	UA HVAC Star Exam	UA ATTCP Pre-Qualification challenge exam	Yes
C Newly defined path	8-Years of installation experience, including a minimum of 3 years as a qualified UA journeyman	UA HVAC Star Exam	UA ATTCP Pre-Qualification challenge exam	Yes

Source: California Energy Commission staff

CHAPTER 2:

ATTCP Application Amendment Evaluation

Changes to the Training Prerequisites

The alternative prerequisites pathways (B and C in Table 1 above) exceed the Energy Code requirement and will have the positive effect of removing a disincentive for highly-qualified individuals to enter the program. The change will elevate training and experience obtained outside of the UA labor union program to relevance, while still endorsing the most relevant UA apprenticeship classes.

Program Impacts

The change to the applicant prerequisites still maintains a bar for applicants that exceeds the required minimum but allows for experienced journeymen to enter the program without the additional burden of retaking apprenticeship classes. In the initial growth stages of the program, the change removes an obstacle that may prevent quality candidates from choosing to enter the program and increase the number of certified technicians to support the public. The lasting impact being offered to experienced technicians from outside the UA to join with a logical path to obtaining ATT status.

Staff Assessment

CSPTC's amendment application has been reviewed, and staff has concluded that the alternative prerequisite pathways exceed the Energy Code requirement and will have the positive effect of removing a disincentive for highly-qualified individuals to enter the program. Staff further found that the application amendments were consistent with Section 10-103.2 of the Energy Code. A summary of staff's findings is included in Table 1. Accordingly, staff recommends that the CEC approve CSPTC's amendment, as submitted on September 15, 2021, to be incorporated into CSPTC's ATTCP application.

CHAPTER 3:

Staff Recommendations

Under 10-103.2(f)2 of the 2019 Energy Code, staff has completed its evaluation of the application amendment submitted by CSPTC, which was received in its entirety on September 15, 2021. Staff has determined that the CSPTC's proposed adjustments comply with the requirements in Section 10-103.2(c) of the 2019 Energy Code. Staff recommends that the CEC approve CSPTC's proposed amendment, to be incorporated into CSPTC's ATTCP application.

APPENDIX A:

Glossary

Term	Definition
ATT Acceptance test technician	A field technician who is certified by an authorized ATTCP.
ATTCP Acceptance test technician certification provider	An agency, organization, or entity approved by the CEC to train and certify acceptance test technicians and acceptance test employers.
ATE Acceptance test employer	A person or entity who employs an ATT and is certified by an authorized ATTCP.
CEC California Energy Commission	The California Energy Commission is the state's primary energy policy and planning agency.
CSPTC California State Pipe Trades Council	A CEC-approved ATTCP.
Energy Code Building Energy Efficiency Standards	State regulations contained in Title 24, Parts 1 and 6 of the California Code of regulations and the Reference Appendices.