

DOCKETED

Docket Number:	13-ATTCP-01
Project Title:	Acceptance and Training Certification
TN #:	211664
Document Title:	Status Report
Description:	Status update to CEC on NEBB training and certification program
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Submitter Role:	Applicant
Submission Date:	5/27/2016 12:22:28 PM
Docketed Date:	5/27/2016



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May 27, 2016

California Energy Commission
1516 9th Street MS-14
Sacramento, CA 95814

Attn. Mr. Randy Brumley, PE

RE: NEBB ATTCP Status Update Report

Dear Mr. Brumley,

This letter is to provide the California Energy Commission with a status update of the NEBB ATTCP program. Our previous update was provided to the CEC on April 4th, 2016. It has since been brought to our attention that one of the responses in that report has resulted in the CEC having an expectation from NEBB that was not expected or intended. In that report, the compliance requirement for condition of approval COA-2 was to document the acceptance tests to be performed at each facility. Our response was the following:

Brownson Technical School (BTS) will provide testing on all forms by June 1, 2016. North American Training Center (NATC) will provide testing on all forms with the exception of MCH-15-A (Thermal Energy Storage).

The response was intended to indicate that Brownson Technical School would be *capable* of providing testing on all forms by June 1st. It was never NEBB's intention to be providing training by June 1st; in fact our internal target date has always been September, 2016. Hands-on training cannot be performed at Brownson until the ATT candidates have been properly vetted and have successfully passed the necessary entrance exams and received the necessary training.

NEBB is still in the process of converting our training materials into an on-line/on-demand format and that includes updating our materials to address the changes to the 2016 Building Energy Efficiency Standards. This is necessary because NEBB's ATTCP application was developed under the requirements of the 2013 Standards. The 2016 Standards have been approved and go into effect on January 1, 2016. Because of the changes between the 2013 and 2016 Standards and the timing of our approval as an ATTCP, several of our training and testing modules need to be modified to include and delineate the changes between the 2013 and 2016 Standards. Failure for NEBB to do so would provide no incentive for a Technician to become certified under the 2013 Standards knowing they would have to be re-certified for the 2016 Standards shortly thereafter. For this reason, it is our intention to create the 2016 training and incorporate it into our current modules.

The training and exam modules requiring updating include the following:

- *Thermal Energy Storage (TES) Systems (NRCA-MCH-15-A)*
 - *Incorporates new acceptance criteria.*

- *Minor clarifications:*
 - *Outdoor Air (NRCA-MCH-02-A)*
 - *Supply Water Temperature Reset Controls (NRCA-MCH-09-A)*
 - *Hydronic System Variable Flow Controls (NRCA-MCH-10-A)*
 - *Fault Detection & Diagnostics for DX Units (NRCA-MCH-12-A)*
 - *Automatic Fault Detection & Diagnostic for Air Handling & Zone Terminal Units (NRCA-MCH-13-A)*

There is a CEC mandated timeline for these changes:

- *Program changes must be submitted to CEC no later than July 1, 2016.*
- *Approved Program changes must be implemented by NEBB no later than January 1, 2017.*

There are four modifications required as part of this update:

1. Technician (ATT) On-line/On-demand Training
2. Technician (ATT) Examinations (written and practical)
3. Employer (ATE) On-line/On-demand Training
4. Employer (ATE) Examinations

In order for those changes to be provided to the CEC by July 1st, it is much more effective for all changes to both programs be incorporated and provided to the CEC at the same time. This also allows the CEC staff to review and approve both programs simultaneously. This is the direction NEBB has been pursuing.

Our proposed schedule for these changes is:

Revisions to all training and exam modules for 2013/2016 Combined Program and 2016 Stand-Alone Program:	In Progress
Submission date of all revisions to CEC for review and approval:	July 1, 2016
CEC Approval of 2013/2016 Combined Program:	August 1, 2016
CEC Approval of 2016 Stand-Alone Program:	September 1, 2016

With respect to the CEC approval of the 2013/2016 combined program, NEBB will provide to the CEC no later than August 1, 2016 our final training modules for CEC approval of content. This will not delay NEBB in proceeding with our current development of the on-line training as we will be able to quickly incorporate any changes requested by the CEC into our final modules. The program will be ready to go live immediately upon approval from the CEC. NEBB looks forward to discussing the actual approval process with the CEC staff.

With respect to the CEC approval of the 2016 “stand-alone” program, NEBB will provide to the CEC no later than July 1, 2016 the required status update report that will include a list of all the proposed modifications required to ensure compliance the 2016 standard. The update will also include our final proposal for compliance with the 1% quality assurance requirements. NEBB currently has three different methods to meet the QA requirements under review and we are confident that the CEC will approve of our final proposal. In addition to the status report above, NEBB will provide to the CEC no later than September 1, 2016 our final training modules for CEC

approval of content. The launch date for the 2016 certification program has not been determined; the launch date will be discussed with the CEC staff in order to determine the most appropriate date as there are several factors to be discussed in conjunction with that date.

We hope that the California Energy Commission finds this report acceptable. Please do not hesitate to contact us if you have any questions regarding this report.

Best regards,

A handwritten signature in blue ink, appearing to read "Glenn Fellman". The signature is fluid and cursive, with the first name "Glenn" and last name "Fellman" clearly distinguishable.

Glenn Fellman, Executive Vice President
National Environmental Balancing Bureau