

DOCKETED

Docket Number:	13-ATTCP-01
Project Title:	Acceptance and Training Certification
TN #:	214802
Document Title:	ATTCP-NEMIC-On Site Audit Plan
Description:	N/A
Filer:	Patty Paul
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	12/15/2016 8:27:28 AM
Docketed Date:	12/15/2016



8403 Arlington Boulevard, Suite 100 • Fairfax, Virginia 22031
(o) 703-299-5646 • (f) 703-683-7615 • www.icbcertified.org

NATIONAL ENERGY MANAGEMENT INSTITUTE COMMITTEE

December 15, 2016

Mr. Randy Brumley, P.E.
Mechanical Engineer
Existing Buildings and Compliance Office
California Energy Commission
1516 Ninth Street,
Sacramento, CA 95814-5512

RE: California Code of Regulations, Title 24, Part1, 10-103.2 Nonresidential Mechanical Acceptance Test Training and Certification, Section (d) Requirements for ATTCPs to Provide Regular Reports

Dear Mr. Brumley:

This letter outlines the plan NEMIC's staff proposes to meet the requirement in Section 10-103.2(c) 3F of the 2016 Standards for the Acceptance Test Technician Certification Providers (ATTCP) to perform randomly selected on-site audits of no-less-than 1 percent of each Technician's completed acceptance tests.

Inasmuch as the requirement of the on-site audit is to verify the competency of the Technician performing acceptance testing, NEMIC staff shall perform the audits at the journeyman apprenticeship training centers and testing facilities located throughout the state of California. NEMIC has the infrastructure and qualified personnel to perform the audit in all 17 test forms, with access to the network of training centers and testing facilities equipped to train, certify and verify the Technician performing the acceptance test.

NEMIC staff shall perform audits of no-less-than 1 percent of each Technician's completed acceptance tests by the Technician in the previous year.

Example:

- January 01, 2017 the threshold number of 300 certified Acceptance Test Technicians is surpassed, the registry is "live" and Technicians are completing acceptance tests and submitting the forms. The first year of the registry being "live" and/or the Technician being certified (whichever comes later) is the base year to gather the data of the acceptance tests completed by the Technician, so that data can be used to schedule the Technician at the best convenient journeyman apprenticeship training and testing center for an audit to verify their performance.



- January 01, 2018 NEMIC staff begins to conduct scheduled audits verifying the competency of the Technician performing acceptance testing. The audit will consist of no-less-than 1 percent of all of the completed acceptance tests performed by the Technician within the previous year of the on-site audit.
- Deficiencies in the Technician's performance shall be addressed immediately at the time the on-site audit is complete. The Technician shall be scheduled for remedial training to correctly perform the task(s) in the area of the deficiency.

The journeyperson apprenticeship training and testing centers provide a means to professionally and safely audit the performance of the Technician while reducing or eliminating obstacles and dangers that are inherent to a performing the audits on the construction site. In addition, there are *significant* costs associated with performing the audits on a construction sites and those costs are ultimately realized by the consumer or taxpayer. A few of the obstacles and dangers include:

- Interference or delay of project (scheduling, coordination w/multiple trades)
- Safety (injury to self, others, damage to equipment)
- Site specific requirements (Drug testing, OSHA certifications, PPE, etc.)
- Transportation and access to site
- Liability and confidentiality

I believe the plan developed by NEMIC's staff to verify the competency of the Technician performing the acceptance test meets the requirement in Section 10-103.2(c) 3F of the 2016 Standards for the Acceptance Test Technician Certification Providers.

I look forward to your approval. If you have any questions please contact me.

Sincerely yours,



David L. Bennett
Administrator / NEMIC-ATTCP
c) 412.551.4793 / Email: dbernett@nemiconline.org
Ofc. 703.739.7100 Ext. 602 / Fax. 703.683.7615

20161215-dlb