

## DOCKETED

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*Comment Received From: BOHDAN FEDYK*

*Submitted On: 8/1/2017*

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## **ATTCP Rule Change Comments**

*Additional submitted attachment is included below.*



**NEBB**

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July 31, 2017

California Energy Commission  
1516 9th Street  
Sacramento, CA 95814

Attn: Dockets Office (MS-4)

Re: Docket # 17-BSTD-01 – 2019 Building Energy Efficiency Standards Pre-Rulemaking

After review of the current proposed changes to the Acceptance Test Technician Certification Provider (ATTCP) requirements NEBB finds all proposed changes to be acceptable except for the Quality Assurance section.

### **QUALITY ASSURANCE**

The current 2016 Quality Assurance language has shown to be a problem. Currently all ATTCP's who were previously approved under the 2013 Code Cycle are awaiting approval by the CEC to continue training under the 2016 Code Cycle. Providing a program to meet the Quality Assurance as it is written has not been possible. NEBB understands the CEC's desire to catch technicians who may possibly be cheating on the forms however the logistics of surprise type of visit is not feasible. As an ATTCP it is our responsibility to provide proper training to the technician's and guarantee they are competent and capable of performing the Mechanical Acceptance Tests properly. An ATTCP cannot prevent a technician who decides to cheat and a surprise visit will not prove a technician has cheated. NEBB can only provide the proper training and completion of our approved program should suffice as evidence the technician is capable of doing the tests properly. NEBB proposes the following changes to the 2019 Building Energy Efficiency Standards:


*Quality Assurance and Accountability. The ATTCP shall describe in their application to the Energy Commission how their certification business practices include quality assurance and accountability measures, including but not limited to independent oversight of the certification processes and procedures, visits to building sites where certified technicians are completing acceptance tests, certification process evaluations, building department surveys to determine acceptance testing effectiveness, and expert review of the training curricula developed for Building Energy Efficiency Standards The ATTCP shall review a random sample of no less than 1 percent of each Technician's completed compliance forms. ~~and shall perform randomly selected on-site audits of no less than 1 percent of each Technician's completed acceptance tests.~~ The ATTCP shall provide continuing education by requiring at each code cycle change the ATT to re-test by means of additional hands-on training. For instance, of Independent oversight may be demonstrated by accreditation under the ISO/IEC 17024 standard.*

NEBB will inform the technician of re-test requirements prior to the new code cycle date. For instance, the 2019 code cycle does not go into effect until January 1<sup>st</sup>, 2020. In late 2018 it will be a requirement of the ATTCP to submit all changes to their current application to show compliance with the new code cycle. Once that approval has been granted by the CEC, NEBB will inform the ATT as well as the ATE that a re-test will be required and will need to be completed by the time the new code takes effect to maintain their certification.

It is NEBB's opinion maintaining the "paper audit" is beneficial to the program and should not be removed. Requiring hands-on re-test every code cycle will provide assurance the ATT's can perform the tests properly. Currently there are no proposed changes by the CEC on this topic and we hope the CEC takes this suggestion and comments into consideration prior to finalizing the 2019 Building Energy Efficiency Standards.

Please do not hesitate to contact us if you have any questions.

Best regards,

A handwritten signature in black ink, appearing to read "Bohdan Fedyk", is positioned above the typed name.

Bohdan Fedyk,  
NEBB Technical Director/Title 24 Program Director