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NLCAA comments 7-18-2017 ATTCP Requirements Presentation

Additional submitted attachment is included below.



California Energy Commission
Docket #: 17-BSTD-01
Project Title: 2019 Building Energy Efficiency Standards Pre-Rulemaking

NLCAA comments on 7-18-2017 ATTCP Requirements Presentation

Comments shared at the CEC Stakeholder Meeting September 14, 2016

Hello CEC staff,

Thank you for your allowing me to speak, my name is Michael Scalzo, I am a Title 24 Consultant and the Executive Director of the NLCAA. I am an ATT Instructor with NLCAA and have performed over 200 Acceptance Testing projects in California. I'm here today to provide you with the perspective of myself and other experts on the performance of the Acceptance Testing program from a "boots on the ground kind of view".

After reviewing the changes for 2016 I personally do have a concern over the Standard's verbiage change in §130.4; "Certifies plans, specifications, installation certificates, and operating and maintenance information meet the requirements of Part 6.". I feel that it will lessen the responsibility of the ATT's in regard to plans and specification's which could vastly reduce their involvement in ensuring that the mandatory requirements are met.

In the early stage of Acceptance Testing the majority of projects were designed and/or installed incorrectly, thus not able to pass the Testing procedures. Many of these issues were due to the engineering firms not being prepared for the new 2013 Standard's changes. Additionally, we also saw the lack of basic requirements in Area Controls, Multi-Level and Auto Shut-Off on the majority of projects that we tested, and many of these requirements were not new to the 2013 Standards. We found that a portion of our time had to be devoted to design compliance to ensure the plans and specifications were correct. As the plans were revised on a project it became only natural to support the installer on a solution to their redesigned controls systems, and then completing the testing procedures. These issues caused many construction delays and cost escalations at the end of the project

ATT's have had to evolve and are now becoming an integral part of projects, this is due to our proficiency in the Standards and our needed support creating compliant designs. Designers and installers have come to rely on the ATT's for their expertise, as well as the AHJ inspectors gaining a level of confidence in the ATT's verification process, not to mention providing the state approved testing forms.

The design issues are still true today, but designers are more aware of the requirements due to the tutelage of the ATT's, but the AHJ's are still approving non-compliant plans. I review roughly 300 sets of plans per year, I and other experts would say 98% of the plans that we review are not compliant.

In closing, the Acceptance Testing process has been challenging due to the continued design issues of even the basic requirements. But this is improving due to the support of the ATT's during their review process and their involvement as part of the Design Team at times. Installation and testing of the lighting systems continues to improve



as the designs do. However, removing the verbiage from §130.4 may impede the continuing improvements that we are seeing on projects.

I am an advocate of Title 24, Part 6 and I am very enthused to be a part of the upcoming Mechanical Acceptance Testing process. I again want to thank you for your time and your consideration.

Thank you for the opportunity to comment.

Michael Scalzo
Executive Director
NLCAA