

DOCKETED

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On Pre-Rulemaking 2019 Title 24

Additional submitted attachment is included below.



CAL SMACNA

California Association
Sheet Metal and
Air Conditioning
Contractors
National
Association

October 19, 2017

California Energy Commission
Attention: Docket No. 17-BSTD-01
Dockets Office 1516 Ninth Street, MS-4
Sacramento CA 95814

RE: Docket No. 17-BSTC-01 -- Pre-Rulemaking 2019 Title 24 Building Energy Efficiency Standards Draft Language Comments

Commissioner McAllister and Commission Staff:

I write on behalf of the members of the California Association of Sheet Metal and Air Conditioning Contractors' National Association (CAL SMACNA)¹ to thank you for the opportunity to comment during the pre-rulemaking period on the draft language for the 2019 Title 24 Building Energy Efficiency Standards.

Our comments, recommendations and questions are as follows:

1. 10-103.2 – NONRESIDENTIAL MECHANICAL ACCEPTANCE TEST TRAINING AND CERTIFICATION

• Authority to Initiate Program on Regional Basis

CAL SMACNA encourages the Commission to amend this section to provide authority for the Commission to initiate the mechanical ATT and ATE certification requirements on a regional basis. For example, if there is a sufficient number of certified ATTs and ATEs to meet the demand in specific urbanized areas of the state -- why wait to turn the program on for those areas? At the same time, the Commission would be able to provide additional ramp-up time to those areas (rural or otherwise) that may not yet have access to a sufficient number of ATEs/ATTs.

• Quality Assurance Provisions for ATTCPs

An effective Quality Assurance (QA) element is essential to the integrity and fairness to all participants in this program. However, the current QA requirements for on-site audits of no less than 1 percent of each ATT's completed acceptance tests poses uniquely difficult circumstances for mechanical ATTCPs that are not similarly experienced by lighting ATTCPs. These circumstances create significant cost drivers and jobsite disruption for owners that do not necessarily translate to proportional gains in energy efficiency. As such, CAL SMACNA encourages the Commission to consider striking the 1 percent on-site audit requirement and allowing for alternative methods of QA for mechanical ATTCPs including but not limited to enhanced desk auditing, mandatory continuing education requirements for ALL ATTs every three years and/or enhanced commissioning processes.

¹ CAL SMACNA is a non-profit statewide trade association representing over 350 sheet metal and air conditioning contractors who employ more than 25,000 union employees and administrative personnel throughout the state of California. These contractors perform commercial and residential heating, ventilating, and air conditioning; architectural and industrial sheet metal; as well as stainless steel kitchen equipment, manufacturing, testing and balancing, siding and decking.

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2. **Appendix NA1 – Nonresidential HERS Verification, Testing, and Documentation Procedures**
Nonresidential mechanical HVAC systems are far more complex than residential HVAC systems. As such, CAL SMACNA would encourage the Commission to begin requiring only those appropriately skilled technicians to be interacting with these non-res systems. The Acceptance Test Technicians (ATTs) certified by Commission approved Mechanical Acceptance Testing Technician Programs are far more qualified for verification, testing and documentation procedures on non-residential systems than those trained on HERS or residential systems. Accordingly, we would encourage the Commission to make all appropriate changes in Appendix NA1 et. seq. to incorporate ATTs and ATTCPs as eligible entities to play their relevant roles in the nonresidential mechanical systems verification, testing and documentation responsibilities.

3. **Appendix NA1.3.3 and NA 1.7 -- Third-Party Quality Control Program**
CAL SMACNA does not understand the scope of this program as written and how this will affect the current non-residential jobsites, the selection of contractors, installation of equipment and other procedures. As we understand the draft language, a Third Party Quality Control Program (TPQCP) would have authority to train and approve installing contractors (NA 1.7.1). CAL SMACNA is very concerned about any new authority being given to a third party to “train” or “approve” of an installing contractor. We would like the Commission to better explain what this program is intended to provide and what interaction and/or oversight these entities will have upon contractors in the field, if any.

4. **Appendix NA2.2.4.3 -- Kitchen Range Hood Verification**
CAL SMACNA members fabricate and manufacture custom kitchen range hood equipment. Our concern is that this section would preclude them from continuing to build these custom hoods without having to receive certification of each hood by HVI. The cost of certification could end custom hood fabrication in California even if those hoods are compliant with the performance metrics the Commission seeks. We would like to see a clear path of alternative compliance for custom range manufacturing to be included in this section.

5. **Appendix NA2.3 Field Verification and Diagnostic Testing of Dwelling Unit Air Leakage**
In NA2.3.1 and NA 2.3.2 we encourage the Commission to list the SMACNA AIR DUCT LEAKAGE TEST MANUAL 2nd EDITION 2012 as an additional reference option for air leakage metrics. This manual would be listed in each of these sections in addition to the current reference to ANSI/RESNET/ICC N380-2016.

CAL SMACNA certainly appreciates the efforts made by you and your staff over the past year to ensure an open and public process to evaluate these code change proposals. Our members look forward to continuing our participation when the formal rulemaking begins.

Please do not hesitate to contact me directly at (916) 363-7460 if you or your staff should have questions or need additional information related to the comments contained in this letter.

Sincerely,



Chris Walker
Executive Vice President
CAL SMACNA