DOCKETED	
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Project Title:	Acceptance and Training Certification
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Document Title:	NEMIC Letter Regarding 2019 NEMIC Amended Application for
	Nonresidential Mechanical Acceptance Test Technician Certification
Description:	NEMIC ATTCP 2019 Amended Application Letter
Filer:	David Bernett
Organization:	National Energy Management Institute Committee
Submitter Role:	Applicant
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April 01, 2019

Via the CEC's E-filing System

Attn: Docket Unit (MS-4)
Docket 13-ATTCP-01
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: <u>2019 NEMIC Amended Application for Nonresidential Mechanical Acceptance Test</u> <u>Technician Certification Provider Materials Approval</u>

Dear Docket Unit:

I write on behalf of the National Energy Management Institute Committee ("NEMIC"), to e-file NEMIC's proposed amendments to its previously approved Application to be a Mechanical Acceptance Test Technician Certification Provider under California Code of Regulations ("CCR"), Title 24, Part 6, § 10-103.2 (f) ("Mechanical ATTCP Application"). The original application was approved at the March 11, 2015 business meeting of the California Energy Commission. These documents are submitted under the California Energy Commission's Docket Unit, Docket 13-ATTCP-01.

The 2019 NEMIC Amended Mechanical ATTCP Application includes amendments to the following Attachments to the Application, which are also being submitted for approval:

- Attachment 2.1 NEMIC ATTCP Certification Manual
- Attachment 2.2 Mechanical Acceptance Test Employer Training Materials
- Attachment 2.3 Mechanical Acceptance Test Employer Certification Exam
- Attachment 3.2 Mechanical Acceptance Test Technician Training Materials
- Attachment 3.4 Mechanical Acceptance Test Technician Certification Exam

Attachments 2.2, 2.3, 3.2, and 3.4 contain confidential information and are being submitted under separate cover to the Docket Office along with a "Repeated Application for Confidential Designation." Accordingly, this e-filing *only* contains the Amended Mechanical ATTCP Application along with Attachment 2.1 (ATTCP Certification Manual). In addition, a document summarizing the changes is attached.







No new amendments are proposed for Attachments 1.1, 1.2, 1.3., 1.4, 1.5, 3.1, 3.3, 6.1, 6.2 or 6.3 to the NEMIC Mechanical ATTCP Application. These Attachments remain part of the 2019 Amended Mechanical ATTCP Application but have not been resubmitted.

Attachments 9.1 through 9.9 to the 2013 NEMIC Mechanical ATTCP Application contained information pertaining to interim approval and are no longer relevant. They are hereby deleted and are not part of the 2019 NEMIC Amended ATTCP Application.

The 2019 NEMIC Amended ATTCP Application includes three substantive changes, along with some non-substantive editorial and grammatical cleanup. The three substantive changes involve: (1) updates to training materials for technicians performing work to reflect the CEC's 2019 Title 24 standards; (2) a revised and updated Quality Assurance program to reflect the revised 2019 Title 24 requirements; and (3) amendment of the certification program to provide dual training and certification paths: (a) Mechanical Acceptance Test Technician 1 (MATT-1), certified to perform a specified subset of the most common mechanical acceptance tests; and (b) Mechanical Acceptance Test Technician 2 (MATT-2), certified to perform all mechanical acceptance tests.

The new dual certification requirement is intended to allow for a significant expansion of the number of certified mechanical acceptance test technicians for the most common types of mechanical acceptance tests, while providing a more comprehensive and higher standard of training for the less common and more specialized types of acceptance tests. This dual certification has precedence in the Commission's prior approval of other Mechanical ATTCP programs that provide for certification of mechanical acceptance test technicians for each individual acceptance test, rather than certifying the technician to perform all tests. The NEMIC website and certification numbers will clearly indicate whether a technician is MATT-1 or MATT-2 certified. NEMIC quality assurance procedures will ensure that MATT-1 technicians do not perform or submit acceptance tests for which they are not certified.

NEMIC is confident that, even with these changes, our program will remain the most rigorous ATTCP program approved by the Commission. NEMIC's currently-approved application requires all NEMIC-certified mechanical acceptance test technicians to also be TABB-certified testing, adjusting and balancing technicians. This requirement greatly exceeded the qualification requirements of any other approved ATTCP. The dual certification continues to require MATT-2 technicians to also be TABB-certified testing, adjusting and balancing technicians. MATT-1 technicians are not required to be TABB-certified, but still must demonstrate they have the relevant experience and expertise necessary to be eligible to take the test for certification as a MATT-1. The MATT-1 prequalification requirements meet or exceed Commission requirements and the requirements of other approved mechanical ATTCPs.

The change to a dual certification system will have no impact on current ATTs or ATT Employers. All current NEMIC ATTs meet the requirements for MATT-2 certification. The only



change will be clarification that their certification number indicates they are MATT-2 certified and can perform all acceptance tests.

Within the 2019 NEMIC Amended Application for Nonresidential Acceptance Test Technician Certification Provider, we are also submitting language for NEMIC-certified MATT-2s to provide duct leakage test verification services normally provided by a Home Energy Rating System (HERS) rater. All required training materials and demonstration of compliance are included within the Amended Application and Attachments, and specific points outlined in the 2019 Update Report.

If you have any questions, please do not hesitate to contact me.

Sincerely,

David Bernett
Administrator / NEMIC ATTCP
dbernett@nemiconline.org

cc: Joe Loyer [via email: Joe.Loyer@energy.ca.gov]

Attachment