DOCKETED

Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	234838
Document Title:	California Advanced Lighting Controls Training Program Comments - CALCTP Comments in Response to 2022 Energy Code Pre-Rulemaking
Description:	N/A
Filer:	System
Organization:	California Advanced Lighting Controls Training Program
Submitter Role:	Applicant
Submission Date:	9/18/2020 4:44:14 PM
Docketed Date:	9/18/2020

Comment Received From: California Advanced Lighting Controls Training Program
Submitted On: 9/18/2020
Docket Number: 19-BSTD-03

CALCTP Comments in Response to 2022 Energy Code Pre-Rulemaking

Additional submitted attachment is included below.

CALCTP Comments in Response to the Staff Workshop, 2022 California Energy Code (Energy Code), **S**eptember 10, 2020

The below comments are forwarded on behalf of the CALCTP Board.

CALCTP appreciates the opportunity to support and continue to work with the CEC to implement a database system for tracking acceptance tests performed by certified technicians. CALCTP would like to point out that several requirements proposed under the Staff Recommendations are already being met by CALCTP and while CALCTP agrees that a database is necessary, CALCTP feels that current requests as proposed in the docket are simply too broad. Without further clarity from the Energy Commission, the current proposal will prove to be unworkable and will be too costly to implement.

1. **New Sections 10-103.1(c)3H and 10-103.2(c)3H.: Section H. (vi):** *"Provide all summary reports as requested by the CEC."*
   Justification: *"To guard against the possibility of a falsified acceptance test compliance document, the AHJ must be allowed to access the ATTCP electronic database to verify the authenticity of the compliance documents."*

   Since CALCTP forms were approved in 2014, CALCTP has emailed copies of completed projects to the AHJs, so this requirement is something currently completed by CALCTP.

2. **New Sections 10-103.1(c)3H and 10-103.2(c)3H.: Section H. (v):** *"Provide the CEC access to the electronic database with the authority to inspect and securely download all records."*
   The Justification states, the "*CEC staff must be allowed access to the ATTCP electronic database to review submitted acceptance tests for trends and issues. Furthermore, staff must be able to transfer part or all of the electronic database to allow staff to evaluate the ATTCP program."*

   CALCTP does have some concerns regarding justification language under this section. Can the CEC clarify what is meant by "*allowed access*" to the ATTCP electronic database?

3. CALCTP, at the request of the CEC, has provided CSV files of existing projects to the CEC. Is the CEC request only for 'submitted projects' that have gone to the AHJs?

   Please specify *exactly* what is being requested.

4. Currently, CALCTP provides annual records of all submitted projects in an excel format which includes location, permit number, authority have jurisdiction, and completed acceptance test forms as required.

   Is the only item being requested 'records of submitted projects' but in a different user format that as submitted in annual record? Please clarify.

5. CALCTP provides a list of all projects *audited*, the jurisdiction of the audit, the forms audited, and if the audit is a paper or on-site audit.

It is not clear what additional information is being requested so details on what is being requested beyond the annual report are required. Please clarify.

6. For CALCTP, the auditing database is separate from the project database.

Linking the two databases will result in substantial costs for CALCTP.

In conclusion, CALCTP believes the CNDR should be run by the CEC and not a third-party. To this end there needs to be a definitive end goal in place before moving forward with this effort to ensure the desired results are achieved. CALCTP requests more clearly defined oversight, accountability and detail as to exactly what data the CEC requires from the ATTCP. With regard to providing the CEC with 'access' to the electronic database, although CALCTP can't share proprietary information, CALCTP agrees that sharing of information at some level is needed to ensure better enforcement. As currently proposed, the data request is far too vague. Whatever is decided, it must be cost effective for the ATTCP because any costs incurred by the ATTCP will be passed along to the AT-Employer and ultimately, the building owner.