

DOCKETED

Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	234907
Document Title:	NRDC Comments on Acceptance Test Technician Certification Provider Program
Description:	N/A
Filer:	System
Organization:	NRDC
Submitter Role:	Public
Submission Date:	9/24/2020 7:26:25 PM
Docketed Date:	9/25/2020

*Comment Received From: NRDC
Submitted On: 9/24/2020
Docket Number: 19-BSTD-03*

**NRDC Comments on Acceptance Test Technician Certification
Provider Program**

Additional submitted attachment is included below.

Dear Commissioner McAllister and Energy Commission Staff:

On behalf of the Natural Resources Defense Council (NRDC) and its more than 450,000 members and activists in California advocating for affordable and equitable decarbonization and clean air policies in buildings to help mitigate the climate crisis, we respectfully submit the following comments in response to the California Energy Commission's (CEC's) proposed changes to the Acceptance Test Technician Certification Provider Program (ATTCPP) in the 2022 Title 24 building energy standards presented during the September 10, 2020 workshop.

Verification of systems and controls to ensure that they have been installed and programmed to operate as designed and as required by code is key to achieving energy savings and emissions reductions. Title 24 requires verification for many measures, which often must be conducted by certified acceptance testers. NRDC supports the CEC's efforts to improve the robustness of data available from the acceptance testing process to provide consistent data to the CEC and authorities having jurisdiction, as well as to clarify specific acceptance test requirements.

Several measures under consideration for the 2022 Title 24 cycles contain important verification components which we recommend that the CEC adopt. For example, the Non-Residential Air Infiltration Draft Codes and Standards Enhancement (CASE) report includes a required diagnostic test by a certified provider to test building envelope leakage. Reducing building air leakage is critical to achieving energy savings and enabling decarbonization in commercial buildings through load reduction. Washington state has required nonresidential air barrier testing in its code for a decade and has shown that testing is critical to achieving air tightness in buildings. This is because air leakage is highly dependent on the small details of how different components of the air barrier are installed (often by multiple subcontractors). Officials in Washington state have found that just the knowledge that the building will be tested (even without the teeth of having to pass) significantly improved building leakage rates.

The measures under consideration in the draft CASE reports also include verification components that would be conducted by the installing contractor rather than a certified

acceptance tester. These include verification of covered process requirements, such as the requirements for leakage testing of new compressed air system piping. While not required to be conducted by a certified acceptance tester, this leakage testing is important to catch leaks in new compressed air systems, which if left undetected could lead to decades of unnecessary energy use and emissions. We recommend that the CEC adopt the verification provisions recommended for covered processes in the draft CASE reports.

In summary, we appreciate the CEC's efforts to enhance the current ATT CPP and to clarify the current acceptance testing procedures. We recommend that the CEC move forward with adoption of new proposed acceptance tests and verification requirements proposed in the CASE reports. Ensuring that systems are installed and operated as designed and required is critical to achieving energy savings and emissions reductions.

Sincerely,

Pierre Delforge
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Natural Resources Defense Council