

**DOCKETED**

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*Docket Number: 20-ATTCP-01*

## **Mechanical Acceptance Test Technician Implementation Proceedings**

*Additional submitted attachment is included below.*

Docket No. 20-ATCP-01  
California Energy Commission  
Dockets Office MS-4 1516  
Ninth Street Sacramento, CA 95814-5512  
Mechanical Acceptance Test Technician Implementation Proceedings

Re: Comments on Mechanical ATT Implementation Staff Report as docketed on February 22,  
2021 – TN#236861

Dear Commissioners and Staff:

I am writing on behalf of the National Energy Management Institute Committee (NEMIC) to comment on the Mechanical ATT Implementation Staff Report. NEMIC has been approved by the CEC, as an Acceptance Test Technician Certification Provider (ATTCP), to provide training, certification, and oversight functions for Acceptance Test Technicians (ATTs)

NEMIC supports adoption of the Mechanical ATT Implementation Staff Report recommendations:

- Make the requisite finding pursuant to Title 24, Part 1, Section 10-103.2, but, as necessary, exercise the CEC's discretion to not enforce the requirement to allow a reasonable time for training and implementation, not to exceed six months.
- Actively engage the AHJs, builders, contractors, engineers, and architects to advise them of the program and the enforcement date and offer training.

As confirmed in the Staff Report, the threshold requirements for triggering mandatory use of certified acceptance test technicians to perform title 24 Acceptance Tests have been met. NEMIC alone has certified contractors as acceptance test employers who have a combined service area covering every single county in California. In addition, the 11 SMART and SMACNA training centers have updated their apprentice training programs last year so that they can quickly ramp up training now that this requirement has been triggered. NEMIC estimates that it will train at least 250 apprentices as additional Mechanical Acceptance Testing Technicians per year, beginning this year. There are also approximately 7424 SMART HVAC journeypersons in California that are eligible to become certified Mechanical Acceptance Test Technicians – most of whom have been waiting for certification to become mandatory before investing their time in this program.

The trigger for increased training is industry demand. For that reason, a hard date for enforcement of the certification requirement will be necessary to provide sufficient incentive to workers and contractors that have now seen several years pass without the mandatory certification requirement going into effect. NEMIC supports setting a hard date for enforcement that does not exceed six months. Six months will provide contractors that have been waiting to



certify their employees until the mandatory certification requirement goes into effect a reasonable amount of time for training and certification of their employees through the multiple ATTCP programs that have been approved by the Commission.

NEMIC thanks the Commission for taking this important step to ensure mechanical acceptance test technicians are properly trained. Requiring any person performing a Title 24 mechanical acceptance test to be trained and certified by an approved acceptance test technician certification provider is an important step to helping the state achieve its stated energy efficiency, greenhouse gas reduction and indoor air quality goals.

Sincerely,

Christopher Ruch

Director of Training

National Energy Management Institute