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NLCAA Response 2 to Alternative to NDR Staff report 03-2021

Earlier version was sent in error. Please disregard our earlier version.

Additional submitted attachment is included below.



TITLE

National Lighting Contractors Association of America (NLCAA) response to Docket Number: 19-BSTD-03 236937 TN: 236937 Alternative to NDR Staff report.

DESCRIPTION

NLCAA is in support of the California Energy Commission (CEC) analysis and conclusion showing option 4, the proposal by the California Energy Alliance (CEA), as most likely to produce a favorable result when compared to the three other options cited as a remedy for addressing a redundant and confusing data reporting requirement inherent in the existing NDR approach.

BACKGROUND

The long-standing need for a system to collect and utilize data that can be used to support Energy code compliance, enhancement, and enforcement requires the Commission Compliance Document Repository (CCDR) defined in the 2013 Energy Code. The proposed method defined in the 2008 Energy Code of utilizing a nonresidential data registry (NDR) to collect and provide data to the CCDR, as stated in the analysis, is redundant since Acceptance Test Technician Certification Providers (ATTCPs) currently collect and provide data to the CEC. Moreover, the ATTCP is responsible for providing oversight and quality assurance for the compliance reports and data that is collected and made available to the CEC. The NDR, on the other hand, is not required to provide any quality assurance.

The analysis goes on to show that moving forward with an NDR approach would require tracking of documents and data by both the ATTCP and the NDR. This redundancy could also be a potential source of confusion, complexity, delay and costs inherent in a system where multiple entities are tasked with handling the same data. This of course would be compounded in the case of multiple NDRs. As stated earlier, the oversight and quality assurance experience of the ATTCPs who deal with the compliance documents and more importantly the data within would be lacking in an NDR which merely collects and transmits data and forms.

Table 6: Summary of Staff Evaluation of all Options: provides an excellent summary of the 4 options analyzed which would provide the CCDR with the ability to collect and utilize the compliance reports and data. The CEA proposal not only meets all the criteria to supply the CCDR, but it also represents a path forward unencumbered by data structure complexity thereby avoiding significant development cost and time.

SUMMARY

NLCAA agrees with the analysis and supports CEC option 4, the CEA proposal. In addition, the report describes successful exercises based on the CEA proposal where secure data transfer and data normalization showed promising results. The utilization of an application programming interface (API) approach for data transfer was also cited in the analysis. NLCAA supports the use of API techniques to achieve the data transfer and normalization requirements of the CCDR. APIs are a time proven method that allows companies to give access to their databases while maintaining security and control.



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Moving forward with an API approach precludes the need for complex data structures which are inherently costly to develop and become unwieldy and difficult to maintain over time. NLCAA has been using API methods for many years in conducting day to day business operations and interfacing with learning management systems (LMS) where APIs abound. NLCAA looks forward to working with the CEC to help implement a data transfer system that can be used by all ATTCPs to provide the CCDR with secured access to compliance documents and the data within to ensure Energy Code compliance.

NLCAA also supports the incorporation of additional compliance documents cited in the analysis. The incorporation of the additional documents will be a great help in making the compliance efforts in the field a comprehensive and complete process. NLCAA looks forward to working with the CEC on a process where the ATTCP incorporates those documents as part of the overall operating methodology of ensuring energy code compliance.

NLCAA Staff

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