

DOCKETED

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California Energy Alliance - Comments on Alternative to NDR Staff Report

Additional submitted attachment is included below.



March 12, 2021

California Energy Commission
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Re: Comments on Alternative to NDR Staff Report - Docket Number: 19-BSTD-03, TN #236937

Dear Energy Commission Staff,

Thank you for the opportunity to provide comments on the *California Energy Commission Staff Report on Nonresidential Data Repository for the 2022 Energy Code: Alternative to the Data Registry for Acceptance Test Technician Certification Providers* (Report). The California Energy Alliance (CEA) is the leading advocacy organization for California's energy stakeholders. Founded in 2016, CEA is a nonprofit, non-partisan alliance of business, government, and NGO leaders advocating for energy productivity to achieve economic growth, environmental justice, energy security, affordability, and resilience. Our work focuses on advocacy, outreach, research, and evolution of codes, standards, and policy.

CEA had the pleasure of working collaboratively with its membership and multiple Acceptance Test Technician Certification Providers (ATTCPs) on recommendations regarding the development of a data registry and repository. CEA's original comments and recommendations are found in *Docket 19-BSTD-03, TN#232808, 4/21/2020 CEA Data Registry and Repository Comments*.

CEA appreciates the time and effort the California Energy Commission (Energy Commission) Staff took to analyze and prepare the Report on an alternative to the Nonresidential Data Registry (NDR). We agree with the findings of the this Report as summarized in *Table 6: Summary of Staff Evaluation of all Options* in that CEA's proposal addresses redundancy and duplicative charging concerns, as well as data efficacy and construction workflow. Additionally, CEA agrees with the Energy Commission Staff recommendations for:

- (1) Implementing the CEA Proposal to allow ATTCPs to submit data directly to the CEC CCDR and expand the authority of ATTCPs to collect and store nonresidential compliance documents relative to its area of expertise (i.e., currently limited to new installations of lighting controls and mechanical systems).
- (2) ATTCPs shall be required to submit monthly data transfer packets to the CEC CCDR as will be specified by the CEC.



The above recommendations are in alignment with the CEA Proposal and will address a redundant data reporting requirement that may cause confusion and increase costs. However, CEA would like to address two areas of concern in the Staff Report:

- (1) On page 24 of the Report, it states “*The API will be developed by the ATTCPs in cooperation with and approved by the CEC.*” The CEA proposal recommended that each ATTCP directly provide the Energy Commission specified electronic data and documents per an Application Programming Interface (API). As the central hub, the Energy Commission will need to develop the API. This will allow for consistency across all ATTCPs uploading data and documents to the CDR.
- (2) On page 28 of the Report, the chart indicates that “*The ATTCPs would require that the NRCCs be signed by an ATT relevant to the lighting controls or mechanical systems industry. The ATTCP already provides the necessary quality assurance to validate the accuracy of the compliance documents.*” CEA supports an approach in which ATTs collect the relevant NRCCs and NRCCIs, however, the ATTs should not be responsible to verify the accuracy of the compliance documents as they are not licensed design professionals. CEA would like clarification from Energy Commission Staff on what level of verification is expected from the ATT when validating the compliance documents. CEA believes the ATTs can verify that the forms and boxes are checked correctly but not that the design is correct or compliant.

CEA thanks the Energy Commission for the opportunity to submit these comments, and we look forward to continuing working collaboratively with you on these solutions. Please let us know if you have any questions regarding our comments on the Alternative to NDR Staff Report.

Sincerely,

A handwritten signature in black ink that reads "Josh Dean".

Josh Dean
Executive Director
California Energy Alliance

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cc: Joe Loyer; Mary Lorraine White; Michael J. Sokol; Drew Bohan