

DOCKETED	
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*Comment Received From: NLCAA on behalf of Emmaus Electric
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Emmaus Electric response to Alt to NDR Staff Report

Additional submitted attachment is included below.

To: NLCAA
Michael Scalzo, Executive Director

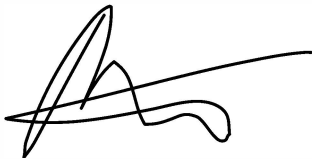
Regarding: Docket #19-BSTD-03
2022 Energy Code Pre-Rulemaking
Chapter 3, Option 4: California Energy Alliance Proposal

In response to the alternatives to NDR (Nonresidential Data Registry) staff report, it is the opinion of Emmaus Electric that the CEC Option 4 proposal is the best option.

Emmaus Electric performs approximately 250 Acceptance Tests on average, annually, over the past 5 years. We have extensive experience in this field, and feel that the two lighting controls ATTCP providers will be capable of working with the Commission Compliance Data Repository (CCDR).

For years now these providers have helped the CEC to develop, improve; and assist in code development, code compliance, and code enforcement. Emmaus Electric supports the CEC option 4, allowing the ATTCPs to provide construction documents directly to the CEC CCDR. The addition of an NDR will add additional cost, complexity, and complications to the compliance process. Any other method than option 4 may interfere with the ATTCPs current Quality Assurance and Accountability programs or duplicate efforts. Option 4 will also allow ATTs, ATEs and the ATTCPs to assist in compliance documentation accuracy where the NDR would be limited.

Blessings,



Kevin White
President

Title 24, Part 6 - CLCATT Technician and Employer
NLCAA- National Lighting Contractors Association of America
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