

**DOCKETED**

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## **TAB Certifications**

To Whom It May Concern,

National Comfort Institute has previously commented on this proceeding when we encouraged the CEC to broaden the definition of Certified TAB Technician. The current definition is limited to certification by AABC, NEBB, or TABB. This narrow definition excludes a large contingent of qualified TAB technicians who are certified by National Comfort Institute and National Balancing Council. Many of the companies who employ these technicians are CSLB licensed D-62 contractors. The training that leads to these certifications is subsidized by Investor-Owned Utility Workforce Education and Training Programs including those of Southern California Edison, San Diego Gas & Electric, and Pacific Gas & Electric. These programs have led to certification of over 800 TAB technicians in the past decade in California. There are currently 267 individuals in the state who hold either an NCI or NBC commercial balancing certification. I want to be sure the irony of the state licensing contractors to perform TAB and subsidizing the training and certification of their technicians while shutting them out from AB-841 funded work is not lost.

NCI/NBC certifications are broadly accepted in by California Authorities Having Jurisdiction, are accepted by the the Environmental Protection Agency for Multifamily HVAC Functional Testing (Link: [https://www.energystar.gov/partner\\_resources/residential\\_new/working/other\\_participants#ftas](https://www.energystar.gov/partner_resources/residential_new/working/other_participants#ftas)), and are currently under consideration for explicit inclusion in the next revision of the IAPMO Uniform Mechanical Code.

NCI fully supports the requirement for TAB performed by a Certified TAB Technician in order to ensure proper functionality, ventilation, and air exchange that is vital to the health of students and teachers. However, the current Certified TAB Technician definition unnecessarily limits the supply of Certified TAB Technicians who can help the state achieve the goals of AB-841, and puts licensed and tax paying TAB contractors with NCI/NBC certifications at a competitive disadvantage. We therefore urge the CEC to leverage utility WE&T efforts to expand the certified TAB workforce, and broaden the definition of a Certified TAB Technician to include National Comfort Institute Commercial Air Balancing and National Balancing Council Large Commercial Air and Hydronic Balancing certifications in the list of acceptable certifications.

Thank you,

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