

<b>DOCKETED</b>	
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<b>Project Title:</b>	School Energy Efficiency Stimulus Program
<b>TN #:</b>	237747
<b>Document Title:</b>	John Hamilton Comments - NCI-NBC not acceptable as and equal to TABB NEBB or AABC
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*Comment Received From: John Hamilton*  
*Submitted On: 5/7/2021*  
*Docket Number: 20-RENEW-01*

## **NCI-NBC not acceptable as and equal to TABB NEBB or AABC**

Docket No. 20-RENEW-01  
California Energy Commission  
Docket Unit, MS-4  
1516 Ninth Street Sacramento, CA 95814-5512  
School Energy Efficiency Stimulus (SEES) Program

Re: Comments on SEES Program Workshop as presented on April 28, 2021

Dear Commissioners and Staff:

I am writing on behalf of the Testing Adjusting and Balancing Bureau (TABB) to comment on the School Energy Efficiency Stimulus Program (â€œSEES Programâ€ ) as presented at the April 28, 2021 Staff Workshop and to respond to several questions that were raised by stakeholders at the workshop.

Public comments have asked the CEC to consider the NCI/NBC certification. The purpose of AB 841 is to ensure that the technicians performing the work are trained and certified to the highest standards. AB 841 was written and passed to ensure high workforce standards that cannot be altered.

NBC/NCI has no published quality assurance program to even compare with TABB, AABC and NEBB all of which have publish tested and used quality assurance programs. This guaranteed by the certification body is available when a customer files a formal complaint on or against a certified contractor.

TABB meets and has public documents showing the following:

- 1) Be an independent body that has in place mechanisms to ensure objectivity and impartiality in its accreditation activities.
- 2) Meet a recognized national or international standard that directs its policy and procedures regarding accreditation.
- 3) Apply a recognized national or international certification standard in making its accreditation decisions regarding certification bodies and programs.
- 4) Conduct on-site visits, ag applicable, to verify the documents and records submitted by credentialing bodies for accreditation.
- 5) Have in place policies and procedures to ensure due process when addressing

complaints and appeals regarding its accreditation activities.

6) Conduct regular training to ensure consistent and reliable decisions among reviewers conducting accreditations.

Certification agencies need to be clearly vetted, as they were in the writing of AB 841, as all certifications are not alike.

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Testing Adjusting and Balancing Bureau (TABB)

1, 2, 4, 6, 7 file:///C:/Users/dsmith/Downloads/ICBCertificationManual\_v170501.pdf

3 <http://tabbcertified.org/site/public/content/index/model-specs>

5 file:///C:/Users/dsmith/Downloads/ICB\_Code\_of\_Conduct.pdf

8 <https://www.ansi.org/Accreditation/credentialing/personnel-certification/AllDirectoryDetails?&prgID=201&OrgId=116&statusID=4>

9 file:///C:/Users/dsmith/Downloads/ICB%20accred.%20cert.%20VDEBETB.pdf

10 <http://tabbcertified.org/site/public/content/index/smacna-endorsement>

11 <https://www.sheetmetal-iti.org/find-a-training-center>

12 Testing, Adjusting and Balancing Bureau. (2012). TAB test facilities. Fairfax, VA.