



October 25, 2011

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

<b>DOCKET</b>	
<b>10-BSTD-1</b>	
DATE	OCT 25 2011
RECD.	OCT 25 2011

Re: Docket # 10-BSTD-01

Subject: October 13 – 14, 2011 Workshop – 2013 Building Energy Efficiency Standards  
Acceptance Testing and Documentation

Dear Sirs:

The Joint Committee on Energy and Environmental Policy was created by the California Local Unions of the Sheet Metal Workers’ representing 20,000 workers employed in over 600 Union HVAC contracting businesses statewide. They fund and operate 15 career apprentice-training facilities spread geographically throughout the California. The training facilities are funded by over \$60 million of industry funds through their collective bargaining relationship with signatory Contractors.

The Mission of the Joint Committee on Energy and Environmental Policy is to promote responsible environmental policy in the State of California and encourage efficient HVAC market transformation through collaboration with industry stakeholders and regulatory agencies.

The California Energy Efficiency Strategic Plan Section 6 set a vision for the Heating Ventilation and Air Conditioning (HVAC) calling for the Industry to be “..transformed to ensure that technology, equipment, installation and maintenance are the highest quality to promote energy efficiency and peak load reduction in California’s climate.”

Air conditioning is one of this State’s largest consuming end use and single largest contributor to peak load. The Industry as a whole has a poor track record of consistently providing quality installations that achieve peak performance necessary to address the demand and peak load dilemma.



The Energy Commission responded to this by enacting more rigorous HVAC equipment sizing and installation requirements which include acceptance testing on key elements of the HVAC system to assure proper system performance prior to a certificate of occupancy being issued. These forms are required to be filled out signed and provided to inspectors. Our Industry worked with the Commission to facilitate inspector training and awareness classes throughout the State regarding Acceptance Testing and documentation requirements. The turn out to our free classes was at best mediocre.

Recently the California Commissioning Collaborative completed research on Acceptance Testing Enforcement and Effectiveness, that report reveals that Code Officials, Contractors and Engineers are not clear on the acceptance testing procedures and form documentation. The forms are by nature very technical and require the tester and documenter to be very familiar with HVAC system theory and operation.

These acceptance tests are very similar to testing, adjusting and balancing reports completed by certified TAB technicians on a regular basis. TAB technicians go through a 5 year apprenticeship (equivalent to a bachelors degree) followed by a two year (masters studies) intensive building systems theory course. All of this is accomplished while they are actually performing this work on a daily basis. After completing their studies they submit to an 8 hour written exam followed by a day test in a certified laboratory, two of which are located in California. There are currently hundreds of these certified technicians working in California, with hundreds presently in class on their path to certification.

We propose that the Building Energy Efficiency Standards 2013 Edition require that all HVAC related acceptance testing and documentation be performed by currently certified TAB technicians certified by the Associated Air Balance Council (AABC), National Environmental Balancing Bureau (NEBB) or the Testing Adjusting and Balancing Bureau (TABB), that these forms be modified by providing a space for the technician to write his name, certification number and agency where he attained certification.

Sincerely,



Executive Administrator

