

DOCKET

10-BSTD-01

DATE Dec. 05 2011

RECD. Dec. 30 2011



December 5, 2011

Commissioner Karen Douglas
California Energy Commission
1516 Ninth Street, MS-31
Sacramento, CA 95814

Re: Docket # 10-BSTD-01

Subject: Building Energy Efficiency Standards Acceptance Testing and Documentation

Dear Commissioner Douglas,

On behalf of the California State Pipe Trades Council, the California State Association of Electrical Workers, and the Western States Council of Sheet Metal Workers, we want to thank you and staff for meeting with us regarding our request to adopt Acceptance Testing and Documentation requirements in the 2013 Standards Update for HVAC and advanced lighting controls. The Commission has repeatedly found the need for appropriate training and certification for both HVAC and lighting controls in order for California to realize its energy efficiency goals.

Recently the California Commissioning Collaborative completed research on Acceptance Testing Enforcement and Effectiveness which revealed 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. For HVAC systems, we propose the following language be added to Title 24, Part 6, Section 125, subsection (a):

SECTION 125 – REQUIRED NONRESIDENTIAL MECHANICAL SYSTEM ACCEPTANCE

(a) Before an occupancy permit is granted the following equipment and systems shall be certified as meeting the Acceptance Requirements for Code Compliance, as specified by the Reference Nonresidential Appendix NA7. Any required testing, adjusting, balancing, inspection, functional performance testing, verification or documentation of mechanical systems shall be performed by a technician certified by (1) the Testing Adjusting and Balancing Bureau (TABB), (2) the National Environmental Balancing Bureau (NEBB) or (3) the Associated Air Balance Council (AABC), and who is employed by a California licensed contractor that holds a TABB, NEBB or AABC contractor certification. A copy of the TABB, NEBB or AABC certification documentation shall be attached to the acceptance and documentation forms. A Certificate of Acceptance shall be submitted to the enforcement agency that certifies that the equipment and systems meet the acceptance requirements:

As we mentioned, the California Advanced Lighting Controls Training Program (CALCTP) is a three year old award winning, industry-wide public/private non-profit training and certification collaborative. The diverse stakeholders of include the Commission, all three investor-owned utilities, U.C. Davis, California Community Colleges, the electrical industry, labor, as well as other state agencies. These acceptance tests require skills that are not commonly found in the industry but which are mastered in the 60 hours of CALCTP training and certification. To be eligible to enter CALCTP, candidates must be state certified general electricians. CALCTP consists of a very rigorous curriculum designed by California utilities, the California Lighting Technology Center at U.C. Davis, and electrical industry master instructors. The training includes 40 hours of hands-on labs which require a 100% pass rate for graduation, and lectures followed by a comprehensive and demanding final exam.

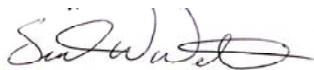
We propose the following amendment to Title 24, Part 6 Section 134, subsection (a):

SECTION 134 - REQUIRED NONRESIDENTIAL LIGHTING CONTROL ACCEPTANCE

((a) Lighting Control Acceptance. Before an occupancy permit is granted for a new building or space, or a new lighting system serving an existing building, space, or site is operated for normal use, all indoor and outdoor lighting controls serving the building, space, or site shall be certified as meeting the Acceptance Requirements for Code Compliance. Any required testing, adjusting and documentation of lighting controls shall be performed by a California certified general electrician who is certified by the California Advanced Lighting Controls Training Program (CALCTP), and who is employed by a California licensed C-10 electrical contractor that holds a CALCTP contractor certification. A copy of the CALCTP certification documentation shall be attached to the acceptance and documentation forms. A Certificate of Acceptance shall be submitted to the enforcement agency under Section 10-103(a) of Title 24, Part 1, that:

We look forward to continue to work with you, your staff, and the commission as the work on the 2013 update moves into the public comment period.

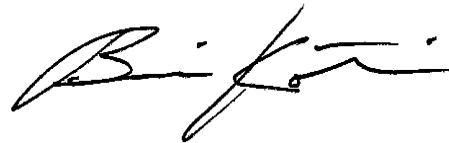
Sincerely,



Scott Wetch
California State Pipe
Trades Council



Erik Emblem
Western State Council
of Sheet Metal Workers



Bernie Kotler
International Brotherhood
of Electrical Workers (IBEW)

Cc: Julia Levin, Resources Agency