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SPEAKER OF THE ASSEMBLY

DOCKET

10-BSTD-1

DATE FEB 06 2012

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February 6, 2012

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,

I write to you today to encourage the Commission to adopt Acceptance Testing and Documentation requirements in the 2013 Standards Title 24 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, made up of diverse interests within the energy and utility sector, revealed that code officials, contractors and engineers are not clear on the acceptance testing procedures and form documentation. These forms are very technical and require the tester and documenter to be intimately familiar with these systems.

In other words, if the state wants to confirm that the energy efficiency targets are in fact being realized, California needs a robust system of certification and documentation in place for those individuals performing this critical work. Fortunately, due to the prior work of the commission and various successful national and statewide certification programs, the 2013 Standards Title 24 update can include these requirements without additional costs to building commissioning and without the need to “reinvent the wheel” to develop certification programs.

For HVAC systems, I support the Commission requiring all HVAC related acceptance testing and documentation be performed by Testing, Adjusting, and Balancing (TAB) technicians certified by the Associated Air Balance Council (AABC), National Environmental Balancing Bureau (NEBB) or the Testing Adjusting and Balancing Bureau (TABBB). As you may know, TAB technicians go through a 5 year apprenticeship (equivalent to a bachelor’s degree) followed by a two year (masters studies) intensive building systems theory course.

For lighting controls, I encourage the Commission to require all advanced lighting control related acceptance testing and documentation to be performed by California state certified general electricians who are also certified by the California Advanced Lighting Controls Training Program (CALCTP), and who are performing the work while employed by a California licensed C-10

electrical contractor who holds a CALCTP contractor certification. As you know, CALCTP is an award winning, industry-wide public/private non-profit training and certification collaborative which includes a diverse set of stakeholders including the Commission, all three investor-owned utilities, U.C. Davis, California Community Colleges. 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 and includes 40 hours of hands-on training in labs which require a 100% pass rate for graduation, and lectures followed by a comprehensive and demanding final exam.

Thank you for your consideration of this request. I look forward to working with you on these issues as the 2013 update progresses.

Sincerely,



JOHN A. PEREZ
SPEAKER OF THE ASSEMBLY