Docket Optical System - FW: Title 24 Acceptance Testing

From: Mark Richards <mark@emeng.com> **To:** <PublicAdviser@energy.ca.gov>

Date: 2/27/2012 9:14 AM

Subject: FW: Title 24 Acceptance Testing

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From: Mark Richards [mailto:mark@emeng.com] Sent: Monday, February 27, 2012 9:11 AM

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Subject: Title 24 Acceptance Testing

Importance: High

Ladies and Gentlemen,

I have come to learn that the CEC is considering rules limiting who can provide Acceptance Testing for Title 24 compliance. As a licensed mechanical contactor, registered professional mechanical engineer, HERS Rater and CEPE among other qualified credentials, I am surprised to learn that additional exclusionary rules being considered.

At this time the Acceptance testing requirements are loosely enforced. Those who do provide the required Acceptance docs are the minority and already have enough trouble figuring out who is responsible for doing the tests and documenting them properly. AHJ inspectors rarely have the qualifications and knowledge to accurately distinguish if the forms have even been filled out correctly. This potential added layer of bureaucracy threatens the effectiveness of the Standards sought by the CEC.

Further limiting who is allowed to complete the Acceptance Testing adds another step towards creating an pseudo "energy police" and is not the right way to enforce the Standards. Education is the right way. Those that have relevant qualifications should not be excluded from providing Acceptance Testing services.

Please consider that in this state of the economy, additional rules limiting who can provide appropriate services is not in the best interest of the majority of people in this industry.

Respectfully Submitted, Mark

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