



**WESTERN  
ALLIED**  
**MECHANICAL, INC**

1180 O'Brien Drive • Menlo Park, CA  
650-326-0750 • www.westernallied.com

February 24, 2012

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 OPPOSE  
LIMITING QUALIFIED PERSONNEL TO ONLY AABC, TABB and NEBB CERTIFIED INDIVIDUALS OR  
FIRMS**

Dear Commissioners:

My name is Angie Simon and I am the President of Western Allied Mechanical. We are a 50 year old design/build mechanical contracting firm in Menlo Park, CA.

I am a member of the Sheet Metal and Air Conditioning Contractors National Association (SMACNA) and write to clarify that I oppose any proposal to narrow or limit the responsibility for acceptance testing and documentation to ONLY those individuals and companies who are certificated by the Associated Air Balance Council (AABC), National Environmental Balancing Bureau (NEBB), the Testing Adjusting and Balancing Bureau (TABB).

Clearly, acceptance testing and documentation under the 2013 Title 24 Energy Efficiency Standards for non-residential structures will require highly trained individuals to perform the work. Whether or not certified by AABC, NEBB or TABB, all licensed mechanical engineers and licensed mechanical contractors who are installing contractors, start-up contractors, or service contractors are highly qualified and should be allowed to serve as acceptance testing Field Technicians for HVAC equipment and controls. Additional training and/or certification should be available to all these individuals as necessary.

This more inclusive approach will ensure highly qualified individuals are performing the work while achieving full and cost-effective compliance with Title 24 in non-residential structures.

Finally, I strongly support creating a place on the Title 24 acceptance forms to clearly identify the responsible party. This will increase accountability and compliance.

Thank you for your consideration of my concerns.

Sincerely,

Angela Simon, P.E.  
President

**DOCKET**

**10-BSTD-01**

DATE Feb. 24 2012

RECD. Feb. 27 2012

## Gary Schwenk

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**From:** Gary Schwenk [gschwenk@bayareasmacna.org]  
**Sent:** Saturday, February 25, 2012 5:38 PM  
**To:** 'PublicAdviser@energy.ca.gov'  
**Cc:** 'oawolowo@energy.ca.gov'; 'mshirakh@energy.state.ca.us'; 'MBrook@energy.state.ca.us'  
**Subject:** Oppose Limiting Qualified Personnel to Only AABC, TABB and NEBB Certified Individuals or Firms

February 25, 2012

### California Energy Commission

Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: Docket No. 10-BSTD-01 Building Energy Efficiency Standards Acceptance Testing and Documentation**  
***OPPOSE LIMITING QUALIFIED PERSONNEL TO ONLY AABC, TABB and NEBB CERTIFIED INDIVIDUALS OR FIRMS***

Dear Commissioners:

This letter addresses a request by SMW Local 104 to support a regulation providing that T-24 Acceptance Testing Forms for commercial HVAC buildings be signed off by AABC, NEBB and/or TABB Certified technicians. We object to this restrictive policy because there are a number of other very qualified parties that should also be authorized by the regulation to sign off on these forms.

Degreed engineers, professional engineers, project managers, commissioning agents and owners of mechanical contracting firms are all imminently qualified and should be included as signers of these acceptance forms. If a Mechanical Contractor is acceptable to stamp a drawing with their contractor stamp and send it in for a permit, they should also be acceptable that they sign off on the acceptance forms.

The work that needs to be performed for the various acceptance forms are as follows:

- Ventilation Systems – VAV and CAV
- Constant Volume, Single Zone, Unitary A/C and Heat Pumps
- Air Distributions systems
- Air Economizer controls
- Demand Control Ventilation
- Supply Fan Variable Flow Controls
- Valve leakage test
- Supply Water Temperature reset
- Hydronic system variable flow control
- Automatic Demand shed control acceptance
- Fault detection and diagnostics for DX units
- Automatic fault detection and diagnostics for air handling and zone terminal units
- Distributed energy storage DX AC Systems testing
- Thermal Energy System storage.

As you can see, many of these tests are not limited to test and balance technician work. Most of this work is done by Sheet Metal, UA and Control systems technicians and during performance the work is witnessed and reviewed by both contractors, engineers and commissioning agents.

Thank you for considering our comments and suggestions.

Sincerely,

**Gary L. Schwenk, Executive Vice President**

**Bay Area SMACNA Chapter**

Airport Corporate Centre

7677 Oakport Street, Suite 1100

Oakland, CA 94621

510-635-8212 Office

510-635-0320 Fax

510-459-8212 Cell

[gschwenk@bayareasmacna.org](mailto:gschwenk@bayareasmacna.org)

**BAY AREA CHAPTER**



SMACNA is a 501(c)(6) non-profit organization. For more information, visit [www.smacna.org](http://www.smacna.org)

February 24, 2012



[publicadviser@energy.ca.gov](mailto:publicadviser@energy.ca.gov)  
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Thank you for considering our comments and suggestions.

Sincerely,  
**ENVIRONMENTAL SYSTEMS, INC.**

*V.C. Infantino*

V.C. Infantino  
President

Cc: [oawolowo@energy.ca.gov](mailto:oawolowo@energy.ca.gov) , [mshirakh@energy.state.ca.us](mailto:mshirakh@energy.state.ca.us) , [mbrook@energy.state.ca.us](mailto:mbrook@energy.state.ca.us)  
3353 DE LA CRUZ BLVD. \* SANTA CLARA, CA 95054 \* TEL: (408) 980-1711 \* FAX: (408) 980-0714



873 81<sup>st</sup> Avenue, Oakland, CA 94621  
510-746-4000 Fax: 510-746-4001  
Contractor License #584263

February 24, 2012

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Thank you for considering our comments and suggestions.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Hengl". The signature is fluid and cursive, with a large initial "L" and "H".

Larry Hengl  
Vice President



State Contractors License • 616780

1309 Laurelwood Road Santa Clara, CA 95054-2759  
Phone: (408) 727-5080

Fax: (408) 727-5409

February 24, 2012

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Sincerely,

A handwritten signature in black ink, appearing to read "Elden Shreve". The signature is fluid and cursive, with the first name "Elden" being more prominent than the last name "Shreve".

Elden Shreve  
Vice President





# Blocka Construction Inc.

General Engineering Contractors  
Industrial Mechanical & Electrical Construction

4455 Enterprise Street,  
Fremont, CA 94538  
Tel: (510) 657-3686  
Fax (510) 657-3688  
E-mail: [info@blockainc.com](mailto:info@blockainc.com)  
CA License No. 679326

February 24, 2012

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**OPPOSE LIMITING QUALIFIED PERSONNEL TO ONLY AABC, TABB and NEBB**  
**CERTIFIED INDIVIDUALS OR FIRMS**

Dear Commissioners:

[Introduce yourself, your company, your position within the company, how long you've been in business].

I am a member of the Sheet Metal and Air Conditioning Contractors National Association (SMACNA) and write to clarify that I **oppose** any proposal to narrow or limit the responsibility for acceptance testing and documentation to **ONLY** those individuals and companies who are certificated by the Associated Air Balance Council (AABC), National Environmental Balancing Bureau (NEBB), the Testing Adjusting and Balancing Bureau (TABB).

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Finally, I strongly support creating a place on the Title 24 acceptance forms to clearly identify the responsible party. This will increase accountability and compliance.

Thank you for your consideration of my concerns.

Sincerely,

  
Jean Blocka  
CFO/COO