

Docket Optical System - Acceptance Testing: Emergency Hearing

From: Thomas Lunneberg <tlunneberg@innovative-nrg.com>
To: <PublicAdviser@energy.ca.gov>
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To Whom It May Concern:

I am writing to express my concern about and opposition to the proposed restrictions as to who can perform acceptance testing. By way of background, I have been a licensed mechanical engineer in California since 1995 and have been involved in building systems commissioning since 1993. I have published articles in trade journals regarding the successful implementation of commissioning in a variety of building projects. I have taught four semesters of a Building Systems Commissioning course through San Diego State University's College of Extended Studies. In the last ten years, I have served as the commissioning agent for nearly 20 LEED projects. During this same period I have provided Acceptance Testing services on only one of these projects. I mention these items to support that I am an informed party with respect to commissioning and building systems testing but I am also somewhat disinterested with respect to Acceptance Testing because it is not a service I actively pursue. The proposed qualification changes for Acceptance Testing will not impact my business. I offer my perspective strictly from the standpoint of providing another experienced voice on the subject of today's emergency CEC hearing.

Since I attended the 2nd National Conference on Building Commissioning in the early 1990s I have embraced the idea that high performance buildings require additional attention in the way of owner requirements definition, design details, and performance testing. My experience is that there is still, in most cases, an experience gap between the understanding that is required to install building systems and the experience necessary to test them. I believe much of this difference relates to an understanding of the underlying energy saving principles of the building systems that extend beyond correct physical installation and start-up. Among the systems that currently require Acceptance Testing, an informed individual can point to specific reasons that economizers, daylight dimming systems, and other energy saving systems do not often work when initially installed. My experience is that the contractor's perspective on these systems is usually different from that of somebody whose professional focus is the correct operation of these systems. To this day, having commissioned more than 30 projects over a 20 year career, I can state that less than 20% of economizers function properly without external oversight--and usually after the contractor/TAB professional has stated that everything was tested and works correctly.

My position is not that contractors should be excluded from providing Acceptance Testing but rather that the current approach of allowing professionals with appropriate experience to provide these services--whether they are a contractor, engineer, or of some other professional background--properly serves the needs of the building industry. Limiting the field due to union and professional organization influence does a disservice to building performance in California. We have seen similar "power plays" taken by the TAB

professional organizations in an effort to limit who can provide building commissioning services by creating a certification that is based on the individual having a TAB background. These power plays are of course self-serving and intended only to direct additional services to the TAB industry; improving the actual performance of buildings does not figure into these strategies of exclusion and restriction of trade. I have a lot of respect for the expertise and experience of many seasoned TAB professionals but I will state from my experience that the vast majority of these individuals do not possess the understanding with respect to energy efficiency to successfully commission building systems.

I thank you for considering my position on this matter, and for hopefully seeing the value in continuing to allow those with proven testing expertise to improve building performance.

Best Regards,

-Tom

Tom Lunneberg, P.E., LEED® AP BD+C
Principal
Innovative Energy Solutions
6965 El Camino Real, Suite 105-492
Carlsbad, CA 92009
760.805.3230 V
760.494.0640 F
tlunneberg@innovative-nrg.com



Tom Lunneberg, P.E., LEED® AP BD+C
Principal
Innovative Energy Solutions
6965 El Camino Real, Suite 105-492
Carlsbad, CA 92009
760.805.3230 V
760.494.0640 F
tlunneberg@innovative-nrg.com

