



Marelich Mechanical Co., Inc.
24041 Amador Street
Hayward, CA 94544-1201
510.785.5500 • Fax: 510.576.1004
License No. 752638

February 27, 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:

By way of introduction, my name is Keith Atteberry and I am the President/CEO of Marelich Mechanical. Our mechanical contracting company has been doing business in the greater Bay Area since 1931.

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

Sacramento Division: 916.388.5300

DOCKET	
10-BSTD-01	
DATE	FEB 27 2012
RECD.	FEB 28 2012

MMF# 2005M
Rev. 4/21/03

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,

MARELICH MECHANICAL CO., INC.

A handwritten signature in blue ink, appearing to read "Keith", with a long horizontal flourish extending to the right.

KEITH R. ATTEBERRY
PRESIDENT & CEO

KRA/jjm