

DOCKET

10-BSTD-01

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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 OUALIFIED PERSONNEL TO ONLY AABC, TABB and NEBB CERTIFIED INDIVIDUALS OR FIRMS

Dear Commissioners,

My name is Mike Pence, my company is Control Air North, I'm the Chief Operating Officer and we've been in business since 1978.

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.

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,

CONTROL AIR NORTH, INC.

Mike Pence

V.P./C.O.O.

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