

DOCKET

10-BSTD-01

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February 24, 2012

Commissioner Karen Douglas
Lead Commissioner for Energy Efficiency
California Energy Commission
1516 9th St., MS-31
Sacramento, CA 95814

RE: Comments on Docket 10-BSTD-01, "Proposals For Certification of Acceptance Testing Field Technicians For Mechanical Systems and Lighting Controls"

Dear Commissioner Douglas:

We have read with interest the announcement for the Lead Commissioner Workshop on Proposals for Certification of Acceptance Testing Field Technicians for Mechanical Systems and Lighting Controls. We also have been made aware of concerns by the organizations representing engineers that this proposal may in fact be limiting the role of acceptance testing solely to contractors. If this is the case, we believe this is definitely a concern and would be clearly a protectionist act on the part of the contractors unions and would not benefit the owners and users of these facilities. Acceptance Testing involves judgment in many cases as to how systems perform relative to the design basis. If the testers are not well versed in the design basis, their judgment may not take into account all the appropriate and potential aspects germane to acceptance and proper performance in the life of the system. Engineers excel at applying judgment to technical conditions and in my opinion, acceptance testing and commissioning is a very 'engineering-centric' activity. We often interpret data that requires advanced knowledge in engineering and much experience not often found in contractors and systems technicians. My recommendation is to continue to allow engineers and certified commissioning authorities to continue in this role of acceptance testing and certainly allow licensed and *qualified* contractors and that are not conflicted due to their installing role in the systems being tested, to perform this activity as well.

We urgently and strongly recommend you oppose Docket 10-BSTD-01. Should you need further clarification of our position or assistance, please feel free to contact us for additional information.

Sincerely,

Lowell Shields P.E.
President
Capital Engineering Consultants Inc.

CC: Ollie Awolowo, Executive Assistant to Commissioner Douglas, California Energy Commission

Mazi Shirakh, Project Manager, Building Energy Efficiency Standards, High Performance Buildings and Standards Development Office, California Energy Commission

Martha Brook, Senior Mechanical Engineer, High Performance Buildings and Standards Development Office, California Energy Commission

Mark Wills, Manager, State and Local Government Affairs, ASHRAE