

February 24, 2012

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

DOCKET	
10-BSTD-01	
DATE	FEB 24 2012
RECD.	MAR 02 2012

RE: Comments on Docket 10-BSTD-01

Subject: Proposals For Certification of Acceptance Testing Field Technicians For Mechanical Systems and Lighting Controls

Dear Commissioner Douglas:

The California Chapter of the Building Commissioning Association is opposed to consideration of Docket 10-BSTD-01” Proposals For Certification of Acceptance Testing Field Technicians For Mechanical Systems and Lighting Controls” as it is inappropriate for the standards to cite certification programs sponsored by a specific industry group(s) to perform the “acceptance testing” that is required of specific equipment by the Building Energy Efficiency Standards (Standards, California Code Regulations, Title 24, Part 6).

While installing contractors serve an important role in the construction of buildings, other qualified persons including licensed engineers and independent building commissioning providers should be allowed to perform acceptance testing of building systems including Heating, Ventilating, and Air Conditioning (HVAC) and lighting systems.

We believe the proposed certifications would limit the number of individuals available to conduct the acceptance testing and would not address the lack of enforcement by local building departments. California certified general electrical contractors certificated by CALCTP as well as TAB contractors who meet the requirements of the Associated Air Balance Council (AABC), National Environmental Balancing Bureau (NEBB) or the Testing Adjusting and Balancing Bureau (TABB), are not uniquely qualified to serve as acceptance testing Field Technicians for HVAC equipment and controls for the following reasons:

- Qualified individuals currently conducting acceptance testing with proposed certifications would be disqualified.
- Proposed certifications do not address inspection procedures and functional/performance test procedures code compliance that serve to determine whether specific building automation systems, components, equipment, systems, and interfaces between systems conform to the criteria set forth in the Standards.
- Proposed certifications do not ensure and promote optimization of system efficiency and performance.
- The proposed certifications will reduce completion and increase costs to building owners.

Finally, we do not believe that it is in the purview of the California Energy Commission to set or adopt criteria for industry certifications of individuals conducting acceptance testing. Qualifications, quality assurance, complaint resolution, conflicts of interest, and codes of ethics are typically regulated by the California Department of Consumer Affairs who establishes minimum qualifications and levels of competency for licensure.

Sincerely,

Bradley Brooks
President – California Chapter, Building Commissioning Association

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 Miller, President, Building Commissioning Association