

VIA E-MAIL



SHEET METAL AND AIR CONDITIONING CONTRACTORS' NATIONAL ASSOCIATION, INC.

DOCKET

10-BSTD-01

DATE MAR 05 2012

RECD. MAR 05 2012

March 5, 2012

California Energy Commission
1516 Ninth Street, MS-31
Sacramento, CA 95814

Re: Docket #10-BSTD-01
Building Energy Efficiency Standards Acceptance Testing and Documentation

Dear Commissioners:

I write on behalf of the Sheet Metal and Air Conditioning Contractors' National Association (SMACNA) concerning the proposal that would limit the ability to perform building energy efficiency standards acceptance testing and documentation to only those individuals and companies who are certified by the Associated Air Balance Council (AABC), National Environmental Balancing Bureau (NEBB), or the Testing, Adjusting and Balancing Bureau (TABB).

SMACNA is an international trade association of contractors involved in the industrial, commercial, institutional and residential markets. SMACNA members specialize in heating, ventilating and air conditioning; architectural sheet metal; industrial sheet metal; kitchen equipment; specialty stainless steel work; manufacturing; siding and decking; testing and balancing; service; and energy management and maintenance.

SMACNA's voluntary technical standards are developed through our ANSI-accredited process, which has found worldwide acceptance by the design/construction community for adoption of SMACNA standards.

During the California Energy Commission (CEC) hearings of February 27 and correspondence submitted prior to and after the CEC hearings there appears to be confusion as to the position of SMACNA National with regard to the proposed Building Energy Efficiency Standards Acceptance Testing and Documentation. SMACNA supports the positions of California SMACNA on the proposal put forth in Docket #10-BSTD-01 for inclusion in the 2013 edition of the Building Energy Efficiency Standards. SMACNA believes that working with the California Energy Commission to develop a program that relies upon industry training for nonresidential contractors, engineers and commissioning providers as the basis for qualifying professionals to complete nonresidential acceptance testing and documentation is an appropriate manner in



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which to proceed. We would recommend the program include the development of criteria for training and/or certification relevant to nonresidential acceptance testing. AABC, NEBB or TABB, licensed mechanical engineers, licensed mechanical contractors who may be installing contractors, start-up contractors, or service contractors should be permitted to serve as acceptance testing field technicians for HVAC&R equipment and controls, once the CEC defines the acceptable training criteria.

SMACNA stands ready to continue our assistance to the CEC and other industry parties in the development of the appropriate acceptance criteria for nonresidential systems.

Professionally yours,
SMACNA

A handwritten signature in black ink that reads "Eli P. Howard, III". The signature is written in a cursive style with a horizontal line at the end.

Eli P. Howard, III
Executive Director Technical Services