



Air-Conditioning, Heating,  
and Refrigeration Institute

## DOCKET

10-BSTD-01

DATE MAR 02 2012

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March 2, 2012

California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

**RE: Docket No. 10-BSTD-01, "Proposals for Certification of Acceptance Testing Field Technicians for Mechanical Systems and Lighting Controls"**

Dear Commissioners:

The Air-Conditioning, Heating and Refrigeration Institute (AHRI) appreciates the opportunity to comment on the "Proposals for Certification of Acceptance Testing Field Technicians For Mechanical Systems and Lighting Controls" from the International Brotherhood of Electrical Workers (IBEW) and the California Local Unions of Sheet Metal Workers being considered by the California Energy Commission. Under this proposal, only licensed testing, adjusting, and balancing (TAB) and electrical contractors will be allowed to perform the required acceptance tests under California Code Regulations, Title 24, Part 6. This proposal would directly impact manufacturers of commercial heating, ventilation and air conditioning products that require installation by a certified contractor.

AHRI is the trade association that represents the manufacturers of air conditioning, heating and commercial refrigeration equipment. AHRI's 300+ member companies account for more than 90 percent of the residential and commercial air conditioning, space heating, water heating, and commercial refrigeration equipment manufactured and sold in North America.

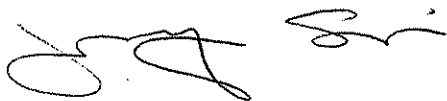
**While AHRI is fully supportive of high quality installation of HVAC products and compliance with Title 24 requirements, AHRI is opposed to the proposal to allow only those individuals and companies who are certified by the Associated Air Balance Council (AABC), National Environmental Balancing Bureau (NEBB), and the Testing Adjusting and Balancing Bureau (TABB) perform acceptance tests under Title 24 for the following reasons:**

1. This proposal will significantly reduce the number of individuals permitted to perform these tests – effectively prohibiting licensed engineers, commissioning agents, control contractors, general contractors, and others qualified to conduct these tests without paying for an additional certification. We are concerned that this unnecessary restriction will create bottlenecks in the market and needlessly inhibit the installation of commercial HVAC equipment;
2. Furthermore, requiring additional certification and restricting it to only a three organizations not only increases the burden of compliance for businesses, but also unfairly elevates three certifications in the marketplace;
3. Finally, this proposal does not clearly advance the stated purpose of California's Title 24 regulations – to reduce the state's energy consumption. AHRI encourages the Commission to consider alternatives to this proposal to promote successful acceptance testing – such as more clearly identifying the "responsible party" on acceptance forms and making additional training

and/or certification available to all licensed engineers, commissioning agents, control contractors, general contractors, and others qualified to perform these tests, if needed.

Thank you for your consideration of these concerns, please contact me at (703) 600-0302 if there are additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer Silvi', written in a cursive style.

Jennifer Silvi  
Government Affairs Manager, AHRI