



**Region 9 Board of Governors
2011 – 2012**

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DOCKET

10-BSTD-01

DATE FEB 29 2012

RECD. MAR 05 2012

February 29, 2012

Karen Douglas
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

**Re: Certification of Acceptance Testing Field Technicians for
Mechanical Systems and Lighting Controls**

Dear Commissioner Douglas:

Region 9 (California) of the American Society of Civil Engineers (ASCE) recently became aware of a proposal to establish new restrictions on those who are eligible to perform acceptance testing for mechanical systems and lighting controls.

Because of the limited time available to comment on these two proposals, we would urge the commission to delay the commencement of a rule making. As I am sure you will agree, this is a very complex issue and we are concerned that a rush to adopt these proposals may result in unwarranted action by the Commission.

ASCE Region 9 proudly represents more than 18,000 civil engineers in public and private practice in California. Please do not hesitate to contact me in the event I can provide additional information about ASCE's position or other matters related to the practice of civil engineering.

Sincerely,

Jennifer B. Epp, P.E., M.ASCE
Chair / Director