



DOCKET

10-BSTD-01

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March 5, 2012

TO: Ms. Karen Douglas, Commissioner, California Energy Commission
Attn: Dockets Office, MS-4, Re: Docket No. 10-BSTD-01

FR: California Building Industry Association
California Business Properties Association

Re: Certification of Acceptance Testing Field Technicians for Mechanical Systems and Lighting Controls; Docket No. 10-BSTD-01

Dear Commissioner Douglas:

California Business Properties Association (CBPA) and California Building Industry Association (CBIA) have questions regarding the proposal "Certification of Acceptance Testing Field Technicians For Mechanical Systems and Lighting Controls," that is currently under consideration by the California Energy Commission.

We would urge the California Energy Commission (CEC) to fully consider these questions prior to moving forward with a rulemaking on this subject. These are complex issues and we are concerned with unintended consequences, such as creating a constraint on availability of qualified individuals and companies and whether or not there is adequate time to get the program up and running.

We also have ongoing policy concerns about the CEC considering proposals that would cede authority to non-public entities without going through any type of public review or established process.

That being said, however, we would like to make sure that the CEC has considered the following questions:

Administrative Process

- Has the CEC established an administrative process by which a national or state-based program for certification of acceptance testing technicians could apply and seek formal recognition within California?
- What administrative criteria/process would the California Energy Commission use in formally determining that a specific entity meets certain minimum criteria thus allowing that entity to be designated as an "acceptable" certification program operator?

Timing

- If the CEC is proposing to implement some manner of mandate by the January 1, 2014 effective date of the updated energy efficiency standards, does this allow enough time for a smooth transition to the new system? Put differently, is there an **adequate supply** of certified acceptance testing technicians on a **statewide basis** who can provide these services at a **reasonable and competitive rate**?
- How long would it take for other interested programs/entities to seek out and obtain formal recognition by the CEC?

Again, we respectfully ask that you temporarily delay the commencement of a rulemaking to more thoroughly understand the need for the proposal and the potential policy impacts.

If you have any questions please feel free to call Matthew Hargrove (CBPA) at 443-4676 or Bob Raymer (CBIA) at 443-7933. Thank you for your attention to this matter.