



**CAL SMACNA**

**MEMORANDUM**

**DOCKET**

**10-BSTD-01**

DATE MAR 05 2012

RECD. MAR 06 2012

To: CEC

From: Randy Attaway, President of CAL SMACNA

Date: March 5, 2012

Re: **DOCKET #10-BSTD-01**  
**CEC Staff Questions Related to T-24 HVAC Acceptance Testing and Documentation**

California  
 Association  
 Sheet Metal  
 and  
 Air Conditioning  
 Contractors  
 National  
 Association

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On behalf of the members of the California Association of Sheet Metal and Air Conditioning Contractors' National Association (CAL SMACNA) please see the following responses to the Staff Questions distributed during the February 27th 2012 hearing on T-24 acceptance tests. Naturally, CAL SMACNA's responses are limited to only those staff questions that are HVAC related.

***1. Is it appropriate for the Standards to limit who can serve as an acceptance testing Field Technician to only persons who meet specific training and certification requirements?***

**Response:**

Yes. Non-residential HVAC systems are highly complex. Any individual working on these systems should be required to have extensive training and industry experience. The proposed standards should require that any person who performs these tests to demonstrate full competency in their knowledge of the equipment and systems being tested, as well as, the T-24 test goals, requirements and procedures.

In demonstration of their systems knowledge, we support a requirement for individuals to prove completed industry work experience, as well as, acquire additional T-24 specific training/certification if necessary.

***2. Would persons who currently are allowed to serve as acceptance testing Field Technicians be disadvantaged by training and certification requirements? How should training and certification requirements be designed to provide a reasonable path for these persons to become qualified?***

**Response:**

Perhaps. To the extent that additional training or certification is required by the CEC, some existing field technicians performing this work may be inconvenienced. The discussion on additional training/certification should include SMACNA, SMWIA, ASHRAE, the California Commissioning Collaborative and the IOUs.



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*California SMACNA is an association of SMACNA Chapters, contractors and associate members.  
 Our mission is to provide legislative and regulatory advocacy and program services.  
 Our goal is to provide the unified voice of our industry for the combined benefit of our companies,  
 our employees, and our communities.*

***3. How would training and certification requirements for acceptance testing Field Technicians who perform acceptance testing help to address concerns related to any lack of enforcement by building departments of the acceptance requirements?***

**Response:**

The building departments are perhaps the most significant driver for quality work and T-24 compliance. Any lack of enforcement by these officials cannot be ignored or overcome by additional training and certification by field technicians.

It's a classic issue of "supply and demand." The "supply" is the availability of qualified and experienced technicians performing acceptance testing and documentation properly. The "demand" is the consistent requirement by local building officials that testing and documentation be done properly. A sustainable industry that achieves the T-24 HVAC goals requires both sides of the equation to be addressed simultaneously and aggressively.

To significantly increase enforcement of the acceptance testing by building departments we recommend that the CEC reach out to the engineering community, the contracting community, labor and the IOUs to review the options of incentives and/or requirements for in-house training at building departments on the acceptance tests.

***8. Are testing adjusting and balancing (TAB) contractors who meet all of the apprenticeship experience and testing requirements of the Associated Air Balance Council (AABC) National Environmental Balancing Bureau (NEBB) or the Testing Adjusting and Balancing Bureau (TABB) uniquely qualified to serve as acceptance testing Field Technicians for HVAC equipment and controls?***

**Response:**

Yes – in some instances but not all. For example, under T-24, the three tests that AABC, NEBB and TABB certified TAB technicians and contractors are particularly qualified to perform are NA7.5.1 Outside Air, NA7.5.2 PSZ Controls (*only units w/ programmable thermostats*) and NA7.5.3 Air Distribution Systems. It is our opinion that such a requirement that these certified individuals and firms perform these acceptance tests and documentation is reasonable due to their particular expertise and equipment.

***9. Should licensed mechanical contractors, who are installing contractors, start up contractors, or service contractors, that are not certified TAB contractors be allowed to serve as acceptance testing Field Technicians for HVAC equipment and controls?***

**Response:**

On all testing that is not *NA7.5.1, NA7.5.2, or NA7.5.3*, non-certified TAB contractors should be allowed to serve as acceptance testing field technicians so long as they are able to demonstrate their industry experience and knowledge of non-residential HVAC systems and related T-24 tests and documentation protocols.

***10. Should licensed mechanical engineers be allowed to serve as acceptance testing Field Technicians for HVAC equipment and controls?***

**Response:**

Yes – subject to limitations in response to question #9.

***11. Should building commissioning providers be allowed to serve as acceptance testing Field Technicians for HVAC equipment and controls and for lighting controls?***

**Response:**

Yes – subject to limitations in response to question #9.

***12. If additional persons other than those that are proposed by IBEW or the Sheet Metal Workers are allowed to serve as acceptance testing Field Technicians should they be certified for professional qualifications? If so what certifications would be appropriate for the additional persons (e.g. licensed contractors, engineers, or building commissioning providers)?***

**Response:**

For all tests (*excepting NA7.5.1, NA7.5.2, or NA7.5.3*), we believe that industry experience, demonstration of HVAC systems knowledge and T-24 specific training/certification requirements for TAB technicians, engineers, contractors, or commissioning agents be similar.

At a minimum, criteria should include, minimum years of experience in the building trades, some level of certification (such as certified TAB technician, licensed contractor, certified CXA or PE), and a passing grade in a certification test that was specific to the Title 24 acceptance tests. A group of industry stakeholders including SMACNA, SMWIA, ASHRAE, and others representing the various disciplines within the trade should be convened to achieve consensus on these qualifications.

***15. If TAB certification is required for acceptance testing by a Field Technician should that be limited to acceptance testing related to airflow?***

**Response:**

See response to question #9. TAB technicians and contractors have the unique equipment and knowledge to perform testing such as: NA7.5.1 Outside Air, NA7.5.2 PSZ Controls and NA7.5.3 Air Distribution Systems.

***18. Should the Energy Commission adopt criteria for approval of industry certification programs? If so, what should the criteria be? What qualifications of current certification programs should be included?...***

**Response:**

We agree with Taylor Engineering that this issue is best addressed by an industry coalition that includes at a minimum representation by the following parties:

- · The CEC
- · The IOUs
- · ASHRAE
- · The California Commissioning Collaborative
- · The Unions (Sheet Metal Contractors and IBEW)
- · SMACNA
- · The TAB agencies (NABB, AABC and TABB)

CAL SMACNA appreciates the opportunity to participate in the CEC's discussions on T-24 Acceptance Testing and Documentation. We look forward to continued discussions with the CEC and other interested parties.

Should CEC wish to discuss this issue, or any other issue, please feel free to contact CAL SMACNA's consultant for regulatory affairs Chris Walker or Josh Rosa with Nossaman at (916) 442-8888.

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