



**PARAGON**  
**MECHANICAL INC.**  
 CONTRACTORS LICENSE NO. 490427

P.O. BOX 58 SANTA CLARA, CA 95052

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February 23, 2012

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

Re: Docket # 10-BSTD-01

Dear Commissioners;

<b>DOCKET</b>	
<b>10-BSTD-01</b>	
DATE	FEB 23 2012
RECD.	MAR 09 2012

My name is Steve Benakovich, Vice President of Paragon Mechanical, Inc. We have been in business for 26 years.

Heating ventilating and air conditioning (HVAC) is one of the State's largest consuming end use and single largest contributor to peak load. The California Energy Commission has long recognized the importance of having highly qualified, appropriately trained and certified individuals install and maintain HVAC systems.

We propose that the Building Energy Efficiency Standards 2013 Edition require that all HVAC related acceptance testing and documentation (Acceptance Testing) required by the Standards be performed by currently certified TAB technicians certified by the Associated Air Balance Council (AABC), National Environmental Balancing Bureau (NEBB) or the Testing Adjusting and Balancing Bureau (TABB).

This follows the California Energy Efficiency Strategic Plan Section 6, which set a vision for HVAC, calling for the industry to be "...transformed to ensure that technology, equipment, installation and maintenance are the highest quality to promote energy efficiency and peak load reduction in California's climate."

The Commission currently requires a certified Home Energy Rating System (HERS) raters to perform installation verification testing on HVAC systems for new construction as well as major renovations for residential construction. This proposal will complete the verification loop by requiring certified individuals perform system verification on non-residential HVAC systems.

Acceptance tests and reports are very similar to testing, adjusting and balancing (test) reports completed by TAB technicians on a regular basis. TAB Technicians complete rigorous 4 to 5 year HVAC apprenticeship work study programs followed by written and practical exams. There are currently hundreds of these certified technicians working in the state. Our industry has 15 training facilities along with two accredited certification facilities in California to meet our current and future needs.

As employers, we believe this requirement is the most cost-effective method available to ensure HVAC systems are performing at their peak efficiency. Thank you for your consideration of this request.

Sincerely,  
 Paragon Mechanical, Inc.

Steve Benakovich  
 Vice President

# PARAGON MECHANICAL INC.

10000 W. 10th Avenue, Suite 1000  
Denver, Colorado 80202  
Tel: 303.751.1000

February 21, 2013

Mr. [Name], [Address]

[City, State, Zip]

Dear Mr. [Name]:

Thank you for your inquiry.

At Paragon Mechanical, we are committed to providing the highest quality HVAC services to our customers.

Our technicians are trained and certified in all HVAC systems, including residential, commercial, and industrial. We use only the best equipment and materials to ensure your system operates efficiently and reliably.

We offer a wide range of services, including installation, maintenance, and repair. Our technicians are experienced and knowledgeable, and we provide excellent customer service at all times.

We are currently offering a special discount on all HVAC services. This is a great opportunity to save on your next service call. Please contact us today to take advantage of this offer.

We are also offering a free estimate on all HVAC services. This is a great way to get a better understanding of your system and the services we can provide. Please call us today to schedule your free estimate.

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