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California Energy Commission

**DOCKETED**  
**10-BSTD-1**

TN # 66305

JUL 24 2012

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 10-BSTD-01  
1516 Ninth Street  
Sacramento, CA 95814  
[PublicAdvisor@energy.ca.gov](mailto:PublicAdvisor@energy.ca.gov)

Karen Douglas  
Commissioner  
California Energy Commission  
1516 Ninth Street, MS-33  
Sacramento, CA 95814

Andrew McAllister  
Commissioner  
California Energy Commission  
1516 Ninth Street, MS-33  
Sacramento, CA 95814

Re: Comments on Proposal for Certification of Acceptance Testing Field Technicians for Lighting Controls and HVAC Systems (Docket No. 10-BSTD-01)

There is widespread agreement that the new Title 24 energy code will require sophisticated inspections by highly skilled personnel. I would like to comment on the certification requirements for those performing acceptance testing. The ratepayer-funded California Workforce Education and Training Needs Assessment for Energy Efficiency, Distributed Generation, and Demand Response documented the widespread confusion in the marketplace over what skills are needed, what certifications measure competencies, and what broad occupational training is needed as the building blocks upon which to layer energy specific training. It provided recommendations on the need for certification and on what kinds of certifications the state should adopt.

While the UC Berkeley Don Vial Center for Employment in the Green Economy is pleased to see that the CEC draft language shows recognition of the importance of certification as a means of testing the skills, knowledge and ability (KSAs) to show competency for a particular job like acceptance testing, the approach to choosing which certifications ensure competency is inadequate. Since the CEC criteria for

selecting certifications is vague, I am concerned that this process will not have high enough standards to adequately enforce the new code. Without high quality inspections, the code cannot be enforced, and we will not achieve our energy efficiency goals.

The certifications should, at a minimum, should require the following components:

- Post-secondary training in a state-approved or nationally accredited educational program (including the state-certified apprenticeship system; nationally accredited colleges and universities), with the acceptable training institutions or types of training institutions identified by the CEC
- A minimum number of hours of work experience equal to or exceeding the number of hours to meet any contractor licensure, trade journey card, or any other licenses or regulations affecting contractors or workers working in the field.
- Training and competency testing that includes hands on training and testing.
- Certification should be required of both technicians and their employers

The certification should be clearly tied to a trade or professional organization with continuing education requirements for maintenance of good standing.

CEC approval of a certification body should be based on adherence to the following minimum standards:

- The certification body should be tied to an organization that trains for broad occupational competency in building and construction, including in mechanical systems or in lighting systems.
- Certification agencies should be accredited or have demonstrated that the quality of their certification program has been reviewed and assessed by a qualified third party entity.

Finally, we support the concept of taking advantage of the existing lighting and mechanical system certification programs that are offered by CALCTP, NEBB, AABC and TABB. These programs are already established, are well-respected, are inclusive of both the union and non-union sectors, and have the capability to immediately start providing California acceptance testing certifications. Since these programs already exist, it makes sense to build on these investments.

Carol Zabin, Ph.D.

Co-Chair, Don Vial Center

Research Director, Center for Labor Research and Education