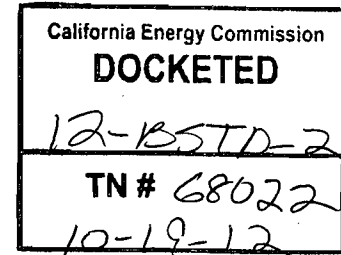


California Energy Commission

Docket#12-BSTD-2

Dockets Office

1516 Ninth Street, MS-4



Re: support of nonresidential acceptance contractor/tester certification

Dear Commissioners,

My name is Randy Young, I am an HVAC Journeyperson. I have been in the HVAC trade since 1987. I have also completed a 5 year apprenticeship where the main focus was HVAC installation.

I am writing in support to the Energy Commission proposal to require Title 24 acceptance tests for Non Residential building to be performed by field technicians that have met specific experience, training and certification requirements. Certification will ensure that acceptance testing is correctly performed and will significantly reduce the incidence of poorly installed and operating below their specified efficiency. Effective testing and adjusting of commercial HVAC systems requires a unique mix of experience, training and competence. Improper installation and inadequate acceptance testing will result in reduced energy efficiency and substandard performance. The TAB organizations identified in the regulation are the only entities that currently provide certification that ensures a technician has the proper experience, knowledge and competence to properly perform such testing. Since these programs already exist it make good sense to take advantage of what they have to offer. Accordingly I strongly support the commissions reliance on certification by these entities.

However, I am concerned the proposed regulations do not provide rigorous enough prequalifications requirements. Training and competency testing must go just beyond teaching a person a generic "acceptance test." This is not sufficient to ensure the real world ability to properly test and adjust commercial HVAC systems. Acceptance testing training necessarily builds upon the knowledge and experience base possessed by electrical and mechanical system professionals. No test is going to be able to cover every permutation of commercial HVAC systems as installed in real world situations. Accordingly, most persons without basic knowledge and experience base in these complex systems would be unable to effectively apply this training in real world situations, even if they were able to pass a classroom test. To ensure effective acceptance testing, it is critical to ensure that acceptance testers have the underlying background and experience in these very complex systems to be able to adjust to the complexities and permutations that a tester will encounter out in the field.

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

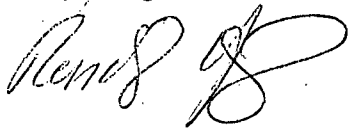
1. Post-secondary training in a state approved or nationally accredited educational program(including the state certified apprenticeship system; nationally accredited colleges and universities), with the training institutions or types of training institutions identified by the CEC.
2. A minimum number 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 this specialized field.
3. Training and competency testing that includes hands on training and testing

The regulations should clearly require that training and competency testing include hands on training and testing. The certification should also be tied to a trade or professional organization with continuing education requirements for maintenance of good standing.

I also believe the acceptance testing and adjusting should NOT be done by the installing contractor, this leaves the door open to so many different possibilities of fraudulent results.

Thank you in advance for your time and consideration of this very important issue.

Randy Young

A handwritten signature in black ink, appearing to read "Randy Young", with a stylized flourish at the end.