California Energy Commission
DOCKETED
12-BSTD-2
TN #68031
10-19-12

October 16, 2012

California Energy Commission
Attention: Docket No. 12-BSTD-2
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814

Re: Support for Proposed Non-Residential Acceptance Contractor/Tester Certification

Dear Commissioners:

My name is Phil Billiard, I am an HVAC Journeyperson. I have been in the HVAC System Installation Trade since 1985. I have completed a 5 year HVAC System/Sheet Metal Apprenticeship program.

I am submitting these comments in support of the Energy Commission's proposal to require certification of anyone performing Title 24 acceptance testing. The proposed Title 24 energy code update requires sophisticated inspections, but these inspections are useless unless performed by acceptance testers that have the skills, knowledge and ability to competently perform these inspections. Without high quality inspections, the code cannot be enforced, and we will not achieve our energy efficiency goals. I support the concept of taking advantage of the existing certification programs that are offered by NEBB, AABC and TABB. AABC, NEBB and TABB are respected, experienced national organizations that were created specifically to verify that HVAC systems perform as designed. Each of these organizations is accredited under ISO/IEC 17024, the internationally recognized standard for certification bodies. This accreditation ensures that TABB, NEBB and AABC have the existing infrastructure and ability to address the challenges of providing training and certification for Title 24 HVAC acceptance test technicians, supervisors and employers. Because these programs are already established, they have the capability to immediately start providing California acceptance testing certifications, ensuring that the benefits of this proposed regulation are achieved sooner rather than later.

While I support the designation of the specific TAB organizations as Acceptance Test Technician Certification Providers, I am concerned that the requirements for allowing other entities to also become Acceptance Test Technician Certification Providers may not be rigorous enough. Approval of an Acceptance Test Technician Certification Provider 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 Providers should be accredited or have demonstrated that the quality of their certification program has been reviewed and assessed by a representative panel of industry experts.

The regulations should also require that any application includes provision of all training and testing procedures, manuals, handbooks and materials and a detailed explanation of how the efficacy of the training curriculum content and methods was evaluated and verified.

Sincerely,