

Public Comment from Rob Falke, President National Comfort Institute
5556 Corporate Avenue, Cypress, CA 90630 rob@ncihvac.com

2013 BUILDING ENERGY EFFICIENCY STANDARDS – NONRESIDENTIAL
ACCEPTANCE TEST TECHNICIAN CERTIFICATION
DOCKET NUMBER 12-BSTD-2 CEC-400-2012-013-ISOR

SECTION 10-103-B – NONRESIDENTIAL MECHANICAL ACCEPTANCE TEST
REQUIREMENTS

The move by the California Energy Commission to accept the training and certification from organizations currently training and certifying test and balance supervisors, technicians and employers to complete the mechanical acceptance tests required in Title-24, Part 6, Sections 120.5 is applauded by National Comfort Institute.

Through our education and certification efforts over the past 20 years in California National Comfort Institute has trained and certified over 800 individuals in commercial and light commercial testing and balancing and find these individuals qualified to perform the testing and reporting required. We believe this is a pool from which many qualified and willing contractors, designers, and other energy professionals can be enlisted into this widening verification effort.

We currently provide such training and certification through a California Workforce Education and Training program we operate through Southern California Edison and have an established training center where we add to these numbers on a monthly basis.

We also are currently operate a Southern California Edison Commercial Quality Renovation Pilot where we train, certify, field coach and provide toll free telephone technical support for energy professionals who test, diagnose, repair and verify their work and the work of others.

We utilize the principles we teach and include the Commercial ComfortMaxx Software to capture live field test and inspection data from commercial HVAC systems. This same software is used by utilities and another state already to digitally document compliance.

In addition to compliance documents, this software also provides effective consumer reports that educate and inform consumers and provide additional benefits directly to them for compliance. The consumer has been a missing link in the verification process which should be provided for.

We believe the training and certification programs offered by National Comfort Institute may be uniquely qualified to meet the nonresidential acceptance test technician and employer certification requirements.

A unique advantage we bring to this opportunity is the ability for qualified mechanical contractors to earn the certifications necessary to test and verify the performance of the systems they build; similar to the approach granted to installing contractors in the nonresidential lighting controls acceptance test requirements.

It appears obvious that enabling certified mechanical contractors test and verify their own projects would go far to ensure that these newly proposed regulations minimize the added costs of complying with the requisite acceptance testing in Title-24, Part 6, for both building owners and acceptance test technicians, thereby improving the cost effectiveness of these regulations and increasing the overall level of compliance in the state far beyond current levels.

This economic benefit of self-verification by the installing contractors does challenge the existing "independent" test and balance but can be verified through the proven physics calculations built into the reporting software that check the validity of the entered test data.

Also, with a greater base of potential candidates it appears the minimum number of 1000 certified individuals may be able to be reached sooner than is possible with the limited preapproved certification provider groups.

In addition, an active quality assurance program based on random field inspection of past work association with a Quality Assurance group will be an essential element of the success of this ruling. We have in place the tools that facilitate effective Quality Assurance and have a proven track record utilizing systems to assure success in this area. Realistic Quality Assurance enlisting M&V methods that certified Test Technicians and Quality Assurance are equally yoked and understand is essential to sustainable compliance and energy efficiency.

In addition to traditional test and balance processes are supplementary tests and calculations that can provide more effective assurance of actual delivered energy efficiency. These tests and principles can be added to existing testing to verify the operating mechanical systems and controls meet the intent and specifications of the designer and manufacturer.

Where traditional testing, adjusting and balancing are adequate for "a match the numbers balancing report," certain technologies and advanced testing is available that can more accurately assure energy has been saved and that systems are operating efficiently, not just delivering specified fluid volumes.

We believe in the future, the model of mechanical contractors and others permitted to test and verify the operating performance of the systems that they build themselves may be a fit in the residential arena as well. This would be a boon to the traditionally small businesses found in the residential HVAC market and may prove to be one of the only ways to meet our shared objectives of increased verification compliance in a cost effective manner.

We would encourage the commission to consider that once the initial 1000 individual quote has been met to assure the ruling's activation that the market will have to continue to drive the demand of verification and compliance. We express a concern that if contractors are required to bear the excessive cost and administration of compliance by hiring an additional third party, as has previously been the case, that the future success this ruling as a move to increase compliance have limited success. Leveling the playing field is one thing, adding an additional layer of cost and compliance providing little tangible benefit to the consumer is quite another.