

Energy - Docket Optical System

From: Eddie Bernacchi [bernacchi@politicogroup.com]
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Subject: Docket No. 12-BSTD-2

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California Energy Commission

DOCKETED
12-BSTD-2

TN # 68492

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MEMORANDUM

To: Docket@energy.ca.gov
California Energy Commission

From: Eddie Bernacchi
California Chapters of the National Electrical Contractors Association

Date: November 12, 2012

Re: Docket No. 12-BSTD-2

I am writing on behalf of the California Chapters of the National Electrical Contractors Association (NECA) in support of the California Energy Commission's proposal to require certification for anyone who perform Title 24 Acceptance Testing and Documentation for advanced lighting control systems and HVAC systems (Docket No. 12-BSTD-2.) Advanced lighting systems are complex systems that require a unique mix of experience, training and competence to ensure proper performance. Currently no certification, training, experience, expertise or demonstration of competence is required for the performance of the CEC acceptance tests. This proposal would ensure that all acceptance testers of advanced lighting systems possess sufficient training, experience, expertise, competence, oversight and accountability to ensure proper installation and performance of advanced lighting systems. Such requirements are necessary if the goal is to assure high quality acceptance testing. Without effective acceptance testing by qualified technicians, California's aggressive energy efficiency goals will not be met and buyers of advanced lighting control systems will not realize the return on investment they pay for and expect to be delivered.

I also strongly support the Commission's decision to take advantage of the existing CALCTP certification program. CALCTP certification provides the training, hands-on experience and oversight needed to ensure that technicians will be able to perform acceptance tests in real-world applications. No comparable certifications exist for advanced lighting controls. Because there are already thousands of CALCTP-certified technicians throughout the state, the designation of CALCTP as a pre-approved certification provider will ensure rapid implementation of this requirement and help California meet its energy efficiency goals.

I also support the proposals to require certification of employers in addition to technicians. This dual certification requirement provides critical quality control assurances. If a contractor does not understand the advanced lighting system sufficiently, he will not manage or support the job appropriately. Furthermore, by putting the contractor's CALCTP certification on the line in addition to the general electrician's, pressure on the CALCTP electrician to quickly test and pass a system is reduced and a high level of accountability and quality control is achieved.

If you should have any questions, or need additional information, please do not hesitate to contact me at (916) 444-3770.

Eddie Bernacchi

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