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Submitted via email to Martha Brook

California Energy Commission
Dockets Office, MS-4

Re: Docket No. 12-BSTD-2

Adoption of Nonresidential Acceptance Testing Certification 15-Day Language

1516 Ninth Street

Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

12-BSTD-2

TN # 68852

DEC. 11 2012

Re: Docket No. 12-BSTD-2 Adoption of Nonresidential Proposed Acceptance Testing Certification

I respectfully submit the following comments on the 15-day language for revisions to the California Building Energy Efficiency Standards, California Code of Regulations, Title 24, Part 1 and Part 6.

1. SECTION 10-103-A (b) 2

Current language:

" - - - expertise in lighting and electrical systems."

Comment:

Expertise in lighting is too broad in scope.

Recommendation:

Change the language to " - - - expertise in lighting controls and electrical systems."

2. SECTION 10-103-A (c) 1

Current language:

" - - - procedures include independent oversight, quality assurance, supervision - - - "

Comment:

Independent oversight is not defined.

Recommendation:

Provide a definition of "independent oversight".

3. SECTION 10-103-A (c) 3 B (i) k

Current language:

"low-voltage retrofits (<50 volts) - - - "

Comment:

The safety procedures should also apply to initial installation

Recommendation:

Change language to "low-voltage equipment (<50 volts)"

4. SECTION 10-103-A (c) 3 B (i) m)

Current language:

"IESNA Lighting Handbook, 9th Edition, July 2000"

Comment:

The 9th Edition is obsolete and has been replaced by the 10th Edition.

Recommendation:

Change language to "IESNA Lighting Handbook, 10th Edition- - -"

5. SECTION 10-103-A (c) 3 B (iii)

Current language:

" - - - expertise in lighting and electrical systems."

Comment:

Expertise in lighting is too broad in scope.

Recommendation:

Change the language to " - - - expertise in lighting controls and electrical systems."

6. SECTION 10-103-A (c) 3 F

Current language:

" - - - procedures include independent oversight, and accountability measures - - -"

Comment:

Independent oversight is not defined.

Recommendation:

Provide a definition of "independent oversight".

7. SECTION 10-103-A (c) 3 F

Current language:

"Third party oversight - - -"

Comment:

Need to explain that "third party" means "independent"

Recommendation:

Change language to "Independent oversight - - -"

8. SECTION 10-103-A (c) 3 G

Current language:

" - - - shall issue a unique certification identification number - - -"

Comment:

CEC should oversee the uniqueness of the numbers issued by the various ATTCPs.

Recommendation:

The numbers could be in the form of: L for lighting and M for mechanical, followed by the number of the ATTCP followed by the number of the ATT, e.g. L-05-1002

9. SECTION 10-103-A (c) 3 F

Current language:

" - - - authorized document Registration Provider personnel - - - "

Comment:

This term has not been previously used.

Recommendation:

Provide a definition for "authorized document Registration Provider personnel"

10. SECTION 10-103-A (e) 2

Current language:

" - - - consisting of at least four hours of instruction - - - "

Comment:

The six curricula items a) through f) are current covered in the 50-hour CALCTP. More than four hours will be required to teach the nine remaining curriculum Items g) through o).

Recommendation:

Change language to " - - - consisting of at least sixteen hours of instruction - - - "

11. SECTION 130.4 (a) and SECTION 120.5 (a)

Current language:

" - - - enforcement agency - - - "

Comment:

Earlier in this document the term "enforcement agency" was capitalized.

Recommendation:

Change language to "Enforcement Agency" or otherwise be consistent throughout the document.

12. SECTION 130.4 (a) 1

Current language:

1. Certifies plans, specifications, installation certificates, and operating and maintenance information meet the requirements of Part 6.

Comment:

The current language is too broad in scope as it includes the envelope, mechanical, as well as, lighting of Part 6.

Recommendation:

Limit the scope to just the lighting portion of Part 6.

13. SECTION 130.4 (a) 2

Current language:

2. Completes the applicable procedures in Reference Nonresidential Appendix NA7.6, NA7.7, NA7.8, and NA7.9; and submits all applicable compliance forms.

Comment:

The language "all applicable compliance forms" is too broad in scope as it includes the envelope, mechanical, and lighting of Part 6.

Recommendation:

Change language to "all related compliance forms".

14. SECTION 130.4 (B)

Current language:

" - - - lighting control system, Energy Management Control System, - - - "

Comment:


The language "Energy Management Control System," is too broad in scope as it includes HVAC, and lighting.

Recommendation:

Change language to " - - - lighting control portion of Energy Management Control System - - - "

Thank you for your consideration of these comments.

Respectfully submitted,



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President