



National Environmental Balancing Bureau

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April 4, 2012

Commissioner Karen Douglas
California Energy Commission
1516 Ninth Street, MS-31
Sacramento, CA 95814

California Energy Commission

DOCKETED
10-BSTD-01

TN 70915

MAY 21 2013

Re: Docket #10-BSTD-01

Subject: Proposals for Certification of Acceptance Testing Field Technicians for Mechanical Systems and Lighting Controls

Commissioner Douglas:

The demonstrated skills, knowledge and experience necessary to become a National Environmental Balancing Bureau Certified Professional (NEBB CP) are commensurate with the requirements of the profession.

Unlike some certification programs that are simply "credential mills", few organizations genuinely understand the skills necessary to be truly competent in building systems.

A NEBB CP is a specialist - thoroughly experienced, appropriately educated, and has demonstrated technical competence in large, intricate and integrated commercial building systems.

The California Energy Commission (CEC) has expressed concerns if there will be sufficient workforce and contractor base in California to meet the demand for certified Field Technicians to perform acceptance testing of commercial buildings.

Some consideration has been given by the CEC to rapidly increase the number of certified Field Technicians to support California Title 24. NEBB is convinced this approach is not in the best interest of the industry, the government or people of State of California. Here are our reasons:

1. The quality of the workforce should not be diluted by acceptance of the product of weak certification programs.

Filling the workforce with under-qualified, under-experienced people drives down the effectiveness of our industry as a whole.

Incorrect or improper building certifications defeat the purpose of Title 24 and the intention of CEC.

Additionally, it quickly becomes frustrating for the improperly trained technicians because they are not confident in what they do day-to-day. Variations in systems, anecdotal situations, and building owner/user demands could force the certifying field technician into either signing off on a system out of ignorance or fear of admitting not understanding the situation jeopardizing their fee and future work.

2. Our professions are highly mobile in their market reach.

The market has long recognized the necessary skills are not easily acquired and mastery is critical.

For example, one NEBB firm has five jobs going on at the moment. Four require travel by air, and the last requires "only a four hour drive". Many firms work on international jobs.

Professionals in this industry are not like the neighborhood plumber. The office does not have to be near the worksite.

3. The workforce population is demand-driven.

When the marketplace will support additional high caliber professionals, they will present themselves for certification.

The National Environmental Balancing Bureau is supportive of the intent of California Title 24, and desires to see it properly implemented.

Please contact me with any questions or for clarification of our comments.

Sincerely,



Steven W. Johnson
Executive Vice President
National Environmental Balancing Bureau
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cc: NEBB EFC
Northern CA/HI NEBB
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