

California Energy Commission

DOCKETED

15-BSTD-01

TN # 76090

AUG 04 2015

August 1, 2015

To: The California Energy Commission Building Energy Efficiency Standard Rulemaking

Docket Number 15-BSTD-01

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REGARDING

Declared cost of Acceptance Testing for lighting alterations.

Comments

Following are comments and cost analysis

Acceptance testing services vary from the simple self-inspections to the professional acceptance testing companies. As different circumstances affect expenses, a multitude of factors must be considered when evaluating testing costs. For example, a company that performs repeated testing for a particular big box client will incur travel expenses (i.e. traveling throughout the state) that a self-inspecting contractor otherwise would not. This docket's analysis provides an inaccurate representation of acceptance testing's actual costs, creating misaligned expectations within the industry. Also noteworthy is the significant fluctuation of ATT hourly rates throughout the state, complicated further by afterhours and expedited service expenses

Having performed over 50+ acceptance tests throughout the state I have yet to have seen a project that required testing of only (2) occupancy sensors. Without including all aspects of acceptance testing NRCA'S: LTI-02-E, LTI-03-E, LTI-04-E, LTO-02-E, this analysis is limited in scope. Establishing these arbitrary estimates, we fail provide customers with a comprehensive understanding of this new service.

An example cost analysis to compare to the 15-BSTD-01 analysis

Description	Hours
Estimate, plan review, NRCI review, proposal prep, admin, NRCA/CEC submission	2
Construction inspection	.5
Functional testing	.5
Trip/Travel time	2
Total technician time	5

Varying Rates Throughout California; average \$91.50

AT & Burden/hr.	\$63	\$120
OH/INS 6%	\$3.78	\$7.20
*AT Fees	\$319.42	\$319.42
Total 5 hours	\$653.32	\$955.42
Average Cost	\$804.37	

2 Occupancy Sensors	Average cost per job	\$804.37
5 Occupancy Sensors	Average cost per job	\$998.35; based on a 30% reduction of time
10 Occupancy Sensors	Average cost per job	\$1,095.34; based on a 30% reduction of time
50 Occupancy Sensors	Average cost per job	\$1,483.50; based on a 30% reduction of time

***-Additional AT Fees**

Provider Fees based on one project per week				
	Yearly	EA		Per AT
Form Fee	52	\$ 200.00	52	\$ 200.00
Audit (10% @ \$300.00)	5.2	\$ 300.00	52	\$ 30.00
License fees	1	\$ 300.00	52	\$ 5.77
Continuing Education	1	\$ 500.00	52	\$ 9.62
Additional Ins (E&O)	1	\$ 3,200.00	52	\$ 61.54
Testing equipment and materials	1	\$ 650.00	52	\$ 12.50
				Total per job \$ 319.42

After review of the cost analysis we have found many differences between the CEC cost analysis and actual acceptance testing cost analysis. Below are considerations that are not including in both the CEC and NLCAA analysis:

- Auto Expenses
- Time onsite for contractor repairs
- Failing the grouping method and testing all O/S in group
- Travel Expenses; Long distance travel, hotel, meals
- Expedite cost for immediate scheduling
- Minimum 4 hour or 8 hour allowance
- Minimal fee
- Parking, Toll, Bridge fees

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