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August 6, 2015

To: The California Energy Commission Building Energy Efficiency Standard Rulemaking

Docket Number 15-BSTD-01

Re: Declared cost of Acceptance Testing

I have been involved in the construction industry for over 30 years. I have been a licensed electrical contractor for 15 years. I have also been a certified acceptance tester for over 1 year. Unfortunately I have yet to have a ATT project, as the counties I serve have yet to implement this program. That being said I have concerns over cost analysis for Acceptance testing for Lighting controls in the report. It is a bit understated and obscure. Acceptance testing and related costs have huge cost variables not studied in the docket report. Travel costs need to be considered as there are not enough ATT scattered in all the different locations throughout the State. Time of day cost needs to be considered as well. Most devices that need testing cannot be tested during normal construction times as the tester needs to have the areas vacant thus a flow of workers will prohibit this.

The minimum costs for ATT in many areas of the state are well over 750.00 per project. In fact to bring a person to our area Inyo/ Mono counties would be a minimum of 1500.00 to provide minimal such services. The data provided is very unrealistic

Hourly rates are much higher than alluded to, I charge 95.00 for private and 135.00 Hr public works.

So I do not agree with the Declared cost of Acceptance Testing for lighting alterations. Nor do I agree with the assumptions that are being used to require acceptance testing for lighting alterations.

I have several other concerns as follows below:

1. The cost of an audit inspection would be more than \$300 , 200-400 is the hard cost from CALCTP the other company is more. Then there is the cost of the return visit by the AT
2. The time it takes to perform a thorough 'plans review' before going to the site needs to be included
3. How does this analysis influence acceptance testing?
4. Is there a point at which cost of testing is unjustified?
5. In every instance that my service were requested the plans did not match the installation or the plans were not compliant. The AT needs to work with the client prior to design and installation in order for the program to work. The time it takes to perform a thorough 'plans review' before going to the site needs to be included in the cost of the Acceptance testing.
6. Has the NCM gone through a peer review by experienced CLCATTs?
7. "Commissioning" is a misnomer. It should be 'acceptance testing'.
8. What makes the Nonres Compliance Manual (NCM) the authority?

Thank you for your time in this matter.

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