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September 30, 2021

Andrew McAllister, Commissioner California Energy Commission *Via email only*

Re:

Follow up to September 10, 2021, IEPR Commissioner Workshop on Building Decarbonization: Quality Installation of Heating and Air Conditioning Equipment

Dear Mr. McAllister:

Thank you for inviting me to the above referenced workshop; I was pleased to represent the Contractors State License Board (CSLB or Board) at the event.

Two questions were posed at the meeting regarding the contractor license classifications that are most appropriate to install specific heating, ventilating, and air conditioning (HVAC) works. As promised, I asked the CSLB Licensing Classification Deputy to provide written answers to the questions, as follows:

Question (1): Regarding a C-36 Plumbing contractor installing a heat pump: May the C-36 connect the heat pump to the electrical panel?

Answer: The most appropriate CSLB license classification for the installation of a heat pump that is part of an HVAC system is the C20-Warm-Air Heating, Ventilating and Air Conditioning classification. It is appropriate for a C20 contractor to self-perform, or subcontract out, any incidental/supplemental electrical work required to accommodate the installation of a heat pump or HVAC system.

Question (2): Regarding a C-20 Warm-Air Heating, Ventilating and Air Conditioning Classification: May the C-20 bury the duct work in existing insulation and/or if additional insulation is needed to cover the duct work?

Answer: It is appropriate for a C20 contractor to bury the ducting of an HVAC system in insulation. If additional insulation is required to sufficiently bury the installation, it is appropriate for the C20 contractor to self-perform, or subcontract out, any incidental/supplemental insulation work required to complete an HVAC system installation. It is not appropriate for a C20 contractor to completely insulate an attic unless that C20 contractor also holds a C2-Insulation and Acoustical classification on their license.

Andrew McAllister, Commissioner September 30, 2021 Page 2

If building department officials or their staff wish to refer potential building permit violations to the CSLB Enforcement Division, they should complete the CSLB building permit violation

referral (link: https://www.cslb.ca.gov/Resources/FormsAndApplications/PermitViolation.pdf) and forward it directly to the following CSLB contact:

Ana Rodriguez, Supervisor
Sacramento Complaint Intake and Mediation Center
Contractors State License Board

<u>Ana.Rodriguez@cslb.ca.gov</u>

916-843-6434

During CSLB's September 23, 2021, strategic planning session, CSLB board member and Sheet Metal Business Representative Michael Mark recommended a strategic objective to prioritize permit compliance consumer/industry education and develop enhanced enforcement strategies. I am pleased to report that CSLB Public Affairs staff have begun development of an informational video to consumers and contractors on the importance of securing a permit and ensuring it is finalized. CSLB will conduct an industry meeting later this year to review and improve upon enforcement strategies.

Sincerely,

David Fogt, Registrar

Contractors State License Board

(916) 255-4000

cc: Michael Mark