



**San Diego Chapter**

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Robert Oglesby  
Executive Director  
California Energy Commission  
1516 Ninth Street, MS 39  
Sacramento, CA 95814-5512



**RE: Acceptance Test Technician Certification Requirement**

Dear Mr. Oglesby,

On behalf of the National Electrical Contractors Association, (NECA) San Diego Chapter's Board of Directors, we are writing to urge the California Energy Commission to ensure that the regulations requiring training and certification of persons who perform Title 24-mandated non-residential "acceptance testing" for lighting controls go into effect *concurrently* with the rest of the 2013 Energy Code on July 1, 2014.

We understand that the Commission must make a final determination in order for this requirement to go into effect and request that the Commission put this determination as an action item on its June 18, 2014 agenda.

Staggering the effective date of various lighting requirements in the Code will cause substantial confusion and should be avoided. Compliance with the lighting control acceptance test requirements will be much more likely and enforcement significantly easier if the certification requirement goes into effect the same date as the rest of the 2013 Energy Code strongly urges the Commission to take the steps necessary to ensure a concurrent roll out on July 1, 2014.

The confusion that will result from staggered implementation dates will come at significant cost to counties, cities and towns in resources spent responding to inquiries from confused applicants, contractors, and other parties. The Energy Commission will also be wasting resources responding to counties and municipalities who are confused by a staggered implementation. This will be in addition to costs which will be incurred by property owners and building departments from higher rates of initial non-compliance.

Delayed implementation of the certification requirement will also result in reduced energy efficiency and sub-standard performance. Until the Commission's certification requirements go into effect, there are no training or qualification requirements for the person performing and documenting the acceptance testing. The 2013 Title 24 energy code requires sophisticated acceptance test inspections, but these inspections are unreliable unless performed by acceptance testers who have the skills, knowledge and ability to competently perform these inspections. Without reliable acceptance tests, the code cannot be meaningfully enforced, and we will not achieve our energy efficiency goals.

Combined, the reasons for going forward with certified acceptance testing far outweigh any minor issues that may be under consideration. Therefore, The San Diego Chapter of NECA once again strongly urge the Commission to take the steps necessary to ensure a concurrent roll out on July 1, 2014.

Sincerely,



Board of Directors  
Karen Prescott, Director Economic Development  
**NECA San Diego Chapter**  
The Voice Of The Electrical Construction Industry

cc

Andrew McAllister  
Commissioner

cc

Karen Douglas  
Commissioner

STATE CAPITOL  
P.O. BOX 942849  
SACRAMENTO, CA 94249-0065  
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# Assembly California Legislature



**SHARON QUIRK-SILVA**  
ASSEMBLYMEMBER, SIXTY-FIFTH DISTRICT

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CHAIR, JOB CREATION FOR THE NEW  
ECONOMY

June 6, 2014

Joan Walter  
California Energy Commission  
Standards Implementation Office  
1516 Ninth Street, MS 28  
Sacramento, CA 95814-5512

Dear Ms. Walter,

As a representative for the 65<sup>th</sup> Assembly District, I am writing this letter to respectfully urge the California Energy Commission to ensure that the regulations requiring training and certification of persons who perform Title 24-mandated non-residential "acceptance testing" for lighting controls go into effect *concurrently* with the rest of the 2013 Energy Code on July 1, 2014.

It is my understanding that the Commission must make a final determination in order for this requirement to go into effect and it would be beneficial for the Commission to put this determination as an action item on its June 18, 2014 agenda.

Staggering the effective date of various lighting requirements in the Code will cause substantial confusion and should be avoided. Compliance with the lighting control acceptance test requirements will be much more likely and enforcement significantly easier if the certification requirement goes into effect the same date as the rest of the 2013 Energy Code. I respectfully request the Commission to take the steps necessary to ensure a concurrent roll out on July 1, 2014.

The confusion that will result from staggered implementation dates will come at significant cost to the 65<sup>th</sup> Assembly District as well as to other counties, cities and towns for the resources spent as a result from responding to inquiries from confused applicants, contractors, and other parties. The Energy Commission will also be wasting resources responding to counties and municipalities who are confused by a staggered implementation. This will be in addition to costs which will be incurred by property owners and building departments from higher rates of initial non-compliance.

Delayed implementation of the certification requirement will also result in reduced energy efficiency and sub-standard performance. Until the Commission's certification requirements go into effect, there are no training or qualification requirements for the person performing and documenting the acceptance testing. The 2013 Title 24 energy code requires sophisticated acceptance test inspections, but these inspections are unreliable unless performed by acceptance testers who have the skills, knowledge and ability to competently perform these inspections. Without reliable

acceptance tests, the code cannot be meaningfully enforced, and we will not achieve our energy efficiency goals.

Combined, the reasons for going forward with certified acceptance testing far outweigh any minor issues that may be under consideration. Therefore, I once again respectfully ask the Commission to take the steps necessary to ensure a concurrent roll out on July 1, 2014.

Please feel free to contact my office should you have any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Sharon Quirk-Silva". The signature is written in a cursive, flowing style.

Sharon Quirk-Silva  
Assemblywoman, 65th District

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ANAHEIM, CA 92806  
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E-MAIL  
Assemblymember.Daly@assembly.ca.gov

# Assembly California Legislature



**TOM DALY**  
ASSEMBLYMEMBER, SIXTY-NINTH DISTRICT

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THE ECONOMY  
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SELECT COMMITTEES  
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TECHNOLOGY AND INNOVATION  
REGIONAL TRANSPORTATION  
SOLUTIONS

June 6, 2014

Robert Oglesby, Executive Director  
California Energy Commission  
1516 Ninth Street, MS 39  
Sacramento, CA 95814-5512

Subject: Effective Date of Lighting Control Acceptance Test Technician  
Certification Requirement

Dear Mr. Oglesby,

It's come to my attention the California Energy Commission is proposing regulations concerning the Title 24-mandated non-residential "acceptance testing" for lighting controls to go into effect at a later date than the 2013 Energy Code.

Staggering the effective date of various lighting requirements in the Code will cause substantial confusion. The staggered implementation will result in a significant cost to counties and cities in resources spent responding to inquiries from applicants, contractors and other parties. This will be in addition to costs which will be incurred by property owners and building departments from higher rates of initial non-compliance.

Delayed implementation will also result in reduced energy efficiency and sub-standard performance. Until the Commission's certification requirements go into effect, there are no qualification requirements for the technician performing and documenting the testing.

I urge the California Energy Commission to implement the certified lighting control acceptance testing concurrently with the 2013 Energy Code on July 1, 2014.

Sincerely,

Tom Daly  
State Assemblymember

CC:

Andrew McAllister, Commissioner, California Energy Commission  
Karen Douglas, Commissioner, California Energy Commission  
Joan Walter, Standards Implementation Office, California Energy Commission



*Serving the People of Santa Ana, Anaheim, Garden Grove and Orange*



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June 16, 2014

Robert Oglesby  
Executive Director  
California Energy Commission  
1516 Ninth Street, MS 39  
Sacramento, CA 95814-5512

Dear Mr. Oglesby:

I am writing as the President of the Sacramento City Unified School District Board of education and the Chair of the district's Facilities Committee, a body that oversees the operations of over 90 facilities throughout Sacramento. I am specifically writing to urge the California Energy Commission to ensure that the regulations requiring training and certification of persons who perform Title 24-mandated non-residential "acceptance testing" for lighting controls go into effect *concurrently* with the rest of the 2013 Energy Code on July 1, 2014.

Staggering the effective date of various lighting requirements in the Code will cause substantial confusion and should be avoided. Compliance with the lighting control acceptance test requirements will be much more likely and enforcement significantly easier if the certification requirement goes into effect the same date as the rest of the 2013 Energy Code. I strongly urge the Commission to take the steps necessary to ensure a concurrent roll out on July 1, 2014.

The confusion that will result from staggered implementation dates will come at significant cost to public agencies such as school districts in resources spent responding to inquiries from confused contractors and other parties. The Energy Commission will also be wasting resources responding to counties and municipalities who are confused by a staggered implementation.

Perhaps most important, delayed implementation of the certification requirement will result in reduced energy efficiency and sub-standard performance. Until the Commission's certification requirements go into effect, there are no training or qualification requirements for the person performing and documenting the acceptance testing. The 2013 Title 24 energy code requires sophisticated acceptance test inspections, but these inspections are unreliable unless performed by acceptance testers who have the skills, knowledge and ability to competently perform these inspections. Without reliable acceptance tests, the code cannot be meaningfully enforced, and we will not achieve our energy efficiency goals.

I once again strongly urge the Commission to take the steps necessary to ensure a concurrent roll out on July 1, 2014.

Sincerely,

Patrick Kennedy

Patrick Kennedy  
President  
SCUSD Board of Education



*Putting Students First*