International Brotherhood of Electrical Workers

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California Energy Commission Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814 – 5512

DOCKET
10-BSTD-1
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Re: Docket # 10-BSTD-01

Subject: October 13 – 14, 2011 Workshop – 2013 Building Energy Efficiency Standards Acceptance Testing and Documentation

Dear Energy Commission,

On behalf of the State Association of Electrical Workers / International Brotherhood of Electrical Workers, I write to urge the commission to require all advanced lighting controls related acceptance testing and documentation to be performed by California certified general electricians who are also certified by the California Advanced Lighting Controls Training Program (CALCTP), and who are performing the work while employed by a California contractor who holds a CALCTP contractor certification, and that these acceptance testing and documentation forms be modified by providing a space for the electrician and the contractor to each write his/her name, and to each attach a copy of their appropriate CALCTP certification documentation.

The Energy Commission recognized the value of CALCTP standards and training when it awarded CALCTP a $407,895 grant through the California Clean Energy Workforce Training Program in February 2010. In addition to the Energy Commission's support, CALCTP has received funding from California utilities, a $5 million grant from the U.S. Department of Labor, as well as California ETP funds.

The California Energy Efficiency Strategic Plan Section 13, on lighting, sets forth the following goals: "Lighting professionals must be trained and certified in the proper specification, installation and maintenance of the most up-to-date best practice technologies and systems. Certified lighting professionals must become the norm; contractors and electricians must be encouraged to obtain lighting certifications, trained to integrate efficient technologies and designs into lighting systems for both new construction and retrofit applications, and rewarded for doing so."

Lighting is the State's largest annual consuming end use and a critical contributor to peak load. The lighting industry has done a reasonable job of replacing inefficient lamps and

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ballasts with more efficient equipment. However, one of the greatest potentials for gains in energy efficiency is through the deployment of lighting control systems that turn off or dim indoor and outdoor lighting. Overall, the lighting industry has a less than acceptable record of consistently providing high quality installations that achieve the optimum performance levels necessary to successfully deal with the peak load and demand issues.

In response, utilities and other lighting industry stakeholders formed a best practice workforce training and certification program, CALCTP. As you may know, CALCTP is a three year old award winning, industry-wide public/private non-profit training and certification collaborative that sets clear standards for skills and builds on the highly effective certified apprenticeship system. CALCTP (www.calctp.org) is supported by all three investor-owned utilities, U.C. Davis, the California Community Colleges, the electrical industry, labor, and many state agencies. CALCTP's certification is likely to be integrated into IOU incentive programs to expand the use and effective application of advanced lighting controls.

According to an extensive study by the CPUC, published as the California Workforce Education & Training Needs Assessment For Energy Efficiency, Distributed Generation, and Demand Response, 2011 ***"The CALCTP presents a model for future IOU workforce planning and sector strategies for the deployment of new clean energy measures and initiatives."*** (Published by the DONALD VIAL CENTER ON EMPLOYMENT IN THE GREEN ECONOMY Institute for Research on Labor and Employment University of California, Berkeley.)

Recently the California Commissioning Collaborative completed research on Acceptance Testing Enforcement and Effectiveness, which found that code officials, contractors and engineers are not clear on the acceptance testing procedures and form documentation. The forms are, by their nature, very technical and require the tester and documenter to be intimately familiar with advanced lighting controls system theory and operation. These acceptance tests require skills that are not commonly found in the industry but which are mastered in the 60 hours of CALCTP training and certification. To be eligible to enter CALCTP, candidates must be state certified general electricians. CALCTP consists of a very rigorous curriculum designed by California utilities, the California Lighting Technology Center at U.C. Davis, and electrical industry master instructors. The training includes 40 hours of hands-on labs which require a 100% pass rate for graduation, and lectures followed by a comprehensive and demanding final exam.

In summary, on behalf of the California State Association of Electrical Workers, we would request that the Building Energy Efficiency Standards 2013 Edition require all advanced lighting control related acceptance testing and documentation to be performed by California state certified general electricians who are also certified by the California Advanced Lighting Controls Training Program (CALCTP), and who are performing the work while employed by a California licensed C-10 electrical contractor who holds a CALCTP contractor certification, and that these acceptance testing and documentation forms be modified by providing a space for the electrician and the contractor to each

write his/her name, and to each attach a copy of their appropriate CALCTP certification documentation.

We look forward to meeting with you and Energy commission staff to discuss this proposal in greater depth. As always, thank you for your consideration of this request. If we can provide any additional information or answer any questions in advance of our meeting, please call.

Sincerely,

Michael Mowrey
International Vice President

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