Brady Air Conditioning & Plumbing Inc.

SMACNA Contractor

License #: 585882
Air Conditioning, Heating & Plumbing
338 North Canal St. #5 SSF, CA 94080-4664
650.742.9640 Fax: 650.742.0452
www.BradyAir.com

Date February 22, 2012

California Energy Commission
1516 Ninth Street, MS-31
Sacramento, CA 95814

Re: Docket # 10-BSTD-01

Subject: Building Energy Efficiency Standards Acceptance Testing and Documentation

Dear Commissioners,

My name in Andrew Hillard, I am the owner and President of Brady Air Conditioning Inc. We have been in business for over 25 years

Heating ventilating and air conditioning (HVAC) is one of the State's largest consuming end use and single largest contributor to peak load. The California Energy Commission has long recognized the importance of having highly qualified, appropriately trained and certified individuals install and maintain HVAC systems.

We propose that the Building Energy Efficiency Standards 2013 Edition require that all HVAC related acceptance testing and documentation (Acceptance Testing) required by the Standards be performed by currently certified TAB technicians certified by the Associated Air Balance Council (AABC), National Environmental Balancing Bureau (NEBB) or the Testing Adjusting and Balancing Bureau (TABB).

This follows the California Energy Efficiency Strategic Plan Section 6, which set a vision for HVAC, calling for the Industry to be "..transformed to ensure that technology, equipment, installation and maintenance are the highest quality to promote energy efficiency and peak load reduction in California's climate."

The Commission currently requires a certified Home Energy Rating System (HERS) raters to perform installation verification testing on HVAC systems for new construction as well as major renovations for *residential* construction. This proposal will complete the verification loop by requiring certified individuals perform system verification on non-residential HVAC systems.

Acceptance tests and reports are very similar to testing, adjusting and balancing (test) reports completed by TAB technicians on a regular basis. TAB technicians complete rigorous 4 to 5 year HVAC apprenticeship work study programs followed by written and practical exams. There are currently hundreds of these certified technicians working in the state. Our Industry has 15 training facilities along with two accredited certification facilities in California to meet our current and future needs .

As employers, we believe this requirement is the most cost-effective method available to ensure HVAC systems are performing at their peak efficiency. Thank you for your consideration of this request.

Sincerely,

Andrew Hillard