Cold Craft

Complete Climate Services for Biotech, Residential & Commercial

- Cooling
- Heating
- Sheet Metal

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DOCKET
10-BSTD-01
DATE FEB 24 2012
RECD. FEB 27 2012

February 24, 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 *OPPOSE LIMITING QUALIFIED PERSONNEL TO ONLY AABC, TABB and NEBB CERTIFIED INDIVIDUALS OR FIRMS*

Dear Commissioners:

Hello I'm Kent Penning, President of Cold Craft, Inc.. We have been in business for over 20 years, we are Diamond Certified and we have Nate Certified technicians.

I am a member of the Sheet Metal and Air Conditioning Contractors National Association (SMACNA) and write to clarify that I ***oppose*** any proposal to narrow or limit the responsibility for acceptance testing and documentation to *ONLY* those individuals and companies who are certificated by the Associated Air Balance Council (AABC), National Environmental Balancing Bureau (NEBB), the Testing Adjusting and Balancing Bureau (TABB).

Clearly, acceptance testing and documentation under the 2013 Title 24 Energy Efficiency Standards for non-residential structures will require highly trained individuals to perform the work. Whether or not certified by AABC, NEBB or TABB, all licensed mechanical engineers and licensed mechanical contractors who are installing contractors, start-up contractors, or service contractors are highly qualified and should be allowed to serve as acceptance testing Field Technicians for HVAC equipment and controls. Additional training and/or certification should be available to all these individuals as necessary.

This more inclusive approach will ensure highly qualified individuals are performing the work while achieving full and cost-effective compliance with Title 24 in non-residential structures.

Finally, I strongly support creating a place on the Title 24 acceptance forms to clearly identify the responsible party. This will increase accountability and compliance.

Thank you for your consideration of my concerns.

Sincerely,

Kent Penning
President
Cold Craft, Inc.

Title 24 Sample Letter.doc