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February 24, 2012

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

Re: Docket No. 10-BSTD-01

Dear Commissioners:

This letter addresses a request by SMW Local 104 to support a regulation providing that T-24 Acceptance Testing Forms for commercial HVAC buildings be signed off by AABC, NEBB and/or TABB Certified technicians. We object to this restrictive policy because there are a number of other very qualified parties that should also be authorized by the regulation to sign off on these forms.

Degreed engineers, professional engineers, project managers, commissioning agents and owners of mechanical contracting firms are all imminently qualified and should be included as signers of these acceptance forms. If a Mechanical Contractor is acceptable to stamp a drawing with their contractor stamp and send it in for a permit, they should also be acceptable that they sign off on the acceptance forms.

The work that needs to be performed for the various acceptance forms are as follows:

- Ventilation Systems – VAV and CAV
- Constant Volume, Single Zone, Unitary A/C and Heat Pumps
- Air Distributions systems
- Air Economizer controls
- Demand Control Ventilation
- Supply Fan Variable Flow Controls
- Valve leakage test
- Supply Water Temperature reset
- Hydronic system variable flow control
- Automatic Demand shed control acceptance
- Fault detection and diagnostics for DX units
- Automatic fault detection and diagnostics for air handling and zone terminal units.

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- Distributed energy storage DX AC Systems testing
- Thermal Energy System storage.

As you can see, many of these tests are not limited to test and balance technician work. Most of this work is done by Sheet Metal, UA and Control systems technicians and during performance the work is witnessed and reviewed by both contractors, engineers and commissioning agents.

Thank you for considering our comments and suggestions.

Sincerely,

Dave Foster