

Docket Optical System - FW: Commissioning Workshop

From: John Littrell <littj@lswsd.com>
To: <PublicAdviser@energy.ca.gov>
Date: 2/29/2012 10:18 AM
Subject: FW: Commissioning Workshop
CC: <MWill@ashrae.org>

Gentlemen:
 Another copy of email which was sent to the wrong address.

John Littrell, PE., President
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DOCKET	
10-BSTD-01	
DATE	Feb. 27 2012
RECD.	March 1 2012

From: John Littrell [mailto:littj@lswsd.com]
Sent: Monday, February 27, 2012 7:14 PM
To: PublicAdviser@energy.ca.gov
Cc: oawolowo@energy.ca.gov; mshirakh@energy.state.ca.us; MBrook@energy.state.ca.us; Wills, Mark
Subject: Commissioning Workshop

Gentlemen:

This email is in opposition to the proposal to allow mechanical and electrical contractors to do commissioning work. I would like to make the following observations:

1. This work has been done by professional mechanical and electrical engineers very successfully for decades. These licensed professionals are in a position to make independent professional judgements based on training, experience, and licensure in the systems being commissioned. It would be a huge step backward to turn this over to contractors who do not possess this training in theory of operation which is crucial to a successful commissioning process. In the last ten or fifteen years, a group of specialty firms has emerged who offer commissioning services. These firms employ properly licensed mechanical and electrical engineers who supervise the commissioning process.
2. Commissioning work very likely falls under the Professional Engineers Act and thus, contractors would not be qualified to do the work. This is for good reason. The commissioning process requires a deep understanding of mechanical and electrical engineering theory to be done properly. Contractors do not get this training in their educational process, nor are they tested on it. If they want to do commissioning, they should study and test for an engineering license and accept all the responsibilities that go with an engineering license.
3. The public interest is not properly protected in allowing subprofessionals to do this work. The level of responsibility of Test and Balance contractors and electrical contractors is considerably lower than that of a professional engineer. The T&B contractor is only responsible to balance the air and water quantities or start up the electrical systems that the professional engineer has designed. He has no responsibility beyond making an effort to achieve what has been designed by Professional and described in the project documents. The Professional Engineer, by contrast, has legal and ethical responsibilities to his client and to the Public at large.

Let me reiterate. It would be a huge mistake to turn this important work over to individuals who are not properly licensed as Mechanical or Electrical Professional Engineers.

Thank you for your consideration.

Very Truly Yours,

John Littrell, PE.
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