August 14, 2014

California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Attn: Tav Commins

Subject: Comments on CALCTP Lighting Control Acceptance Certification Provider Application

Mr. Commins,

I am a certified CALCTP Acceptance Test Technician and can confirm that CALCTP provides the hands-on experience and theoretical training necessary to successfully perform acceptance testing in the real world environment. CALCTP's hands-on training includes experience with lab boards that include a comprehensive variety of lighting control systems that are reflective of the range of systems that are encountered in the field. Because lab conditions are often different from what one sees on the job-site, this hands-on experience with a broad range of systems is invaluable to ensuring that Acceptance Test Technicians are confident in their ability to understand and test any lighting control systems that they may encounter.

While I support approval of CALCTP's application, I believe that the prequalification requirements for approval should be even more rigorous than allowed by CALCTP. Acceptance testing training necessarily builds upon the knowledge and experience base possessed by electrical professionals. There are dozens of different lighting control manufacturers, hundreds of different advanced lighting control products and thousands of different configurations for these systems. Just because a non-electrician has experience in some of these systems does not mean that they are qualified to be trained as a lighting control acceptance tester. Even if they were able to successfully pass certification, most persons without any previous experience in electrical and lighting systems would be unable to effectively apply this training in complex real world situations.

Accordingly, participation in the certification program should be limited to persons who are certified general electricians or who

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have other equivalent verifiable *professional* experience and training in designing or installing lighting and electrical systems, such as electrical engineers. To ensure effective acceptance testing, it is critical to ensure that acceptance testers have the underlying background and experience in these systems to be able to adjust to the complexities and permutations that a tester will encounter out in the field.

Sincerely,

Gary Leder
O'Bryant Electric
Certified Acceptance Test Technician

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