SERRANO
ELECTRIC INC.

September 18, 2014

Mr, Robert Oglesby, Executive Director
Mr. Tav Commins, Mechanical Engineer
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, CA 95814

Subject: ***NLCAA request for Certified Provider or Interim Provider Status***

Gentlemen:

We are writing to request the California Energy Commission ("CEC") grant either Certified Provider Status or Interim Provider Status to the National Lighting Contractors Association of America ("NLCAA"). Despite NLCAA's submission of a completed Lighting Controls Acceptance Test Technician Certification Provider ("ATTCP") application in accordance with 2013 Building Energy Efficiency Regulations Section 10-103, CEC staff recommendation to award Certification Status on July 22, 2014, and tentative placement on the agenda for the last two CEC monthly meetings, NLCAA's application has not been acted on by the CEC. To date, there is only one organization, CALCTP, with Interim Provider status for the entire state of California!

The conduct of the CEC has been detrimental to the citizens of California, NLCAA and the electrical contracting community and their families:

1. Having only one Lighting Controls Acceptance Test Technician Provider creates a monopoly condition forcing ALL contractors to participate in the union based Interim Provider program.
2. Documentation by nonunion contractors demonstrates a bias against nonunion applicants, delaying certification, when seeking Lighting Controls Acceptance Test Technician Certification from CALCTP. As a result, nonunion electricians and contractors are effectively barred from performing this service to the citizens of California, resulting in financial hardship to individual electricians as well as contractors unable to timely obtain certification.
3. The citizens of California are forced to pay higher fees for lighting controls services due to the arbitrarily limited number of certified technicians.
4. NLCAA has expended over $350,000 developing hardware and software to meet the requirements of becoming a Certified Provider. Despite staff recommendation to award Certified Provider status, no action has been taken, thus preventing NLCAA from providing services to the contracting community and unable to conduct business.

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Clearly, this is an untenable condition that can be easily rectified by the CEC. Every day the CEC allows this condition to remain in effect harms the citizens of California. We are respectfully requesting the CEC award Interim Provider Status to NLCAA and allow NLCAA's Certified Provider application to be presented to the CEC at its next meeting.

If I can provide any clarification please contact me at (408-986-1570). Thank you for your time and attention to this matter.

Sincerely,

DANIEL L. SERRANO
President

cc: Jack Yapp

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EXECUTIVE DIRECTOR