

Mechanical Acceptance Test Technician Certification Provider

Certification Implementation Plan



Joe Loyer

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California Energy Commission



Agenda

- The Acceptance Test Technician Certification Provider Program (ATTCP)
- Mechanical ATTCP – Threshold Requirements
- Implementation Issues
- The Certification Implementation Plan
- Next Steps



The ATTCP Program

- Acceptance Test Technicians perform required tests for lighting controls and mechanical systems in nonresidential buildings.
- The California Energy Commission's approved Acceptance Test Technician Certification Providers (ATTCP) to train, certify, and oversee the technicians and their employers.
- Lighting controls acceptance testing requires a certificate, since July 2014.
- Mechanical acceptance testing does not currently require a certificate.



Mechanical ATTCP – Threshold Requirements

- A certified Acceptance Test Technician (ATT) will be mandatory for mechanical acceptance testing only if the Energy Commission formally finds that the Threshold requirements have been satisfied.
- Staff continuously monitors the ATTCPs and is reasonably confident that the Threshold requirements will be satisfied this year.



Required Energy Commission Findings

To make certification required for mechanical acceptance testing, the Energy Commission must determine:

- There are a minimum of 300 certified ATTs statewide (§10-103.2(b)1A), and
- Eligible professions have reasonable access to the requisite training to become a certificated ATT (§10-103.2(b)2).



Status of Requirements

A minimum of 300 certified ATTs statewide.

- There are currently a total of 276 certified ATTs.

Eligible professions have reasonable access to the requisite training to become a certificated ATT.

- There are currently four approved ATTCPs available to offer training, testing, and certification.



Implementation Issues

The following issues were raised at a previous workshop. We seek feedback on our proposed response or interpretation.



No New Rulemaking

The implementation plan should not require a rulemaking or result in an underground regulation.

- An ATT is already mandatory to perform the lighting controls acceptance tests under identical requirements.
- Keeping the requirements as they are now will guarantee a consistent treatment of the Mechanical ATTCPs.
- The requirement that there be no less than 300 certified ATTs can only be modified through a rulemaking.



Contractor Interest is Low

There are too few technicians seeking certification.

- The primary cause of this may be the lack of progress to achieve the Threshold requirements.
- A hard date, rather than a specific number of certified ATTs may encourage more contractors to become certified.
 - A hard date, rather than the required 300, would require a rulemaking.



Industry Access to ATEs

Every county in California should have access to an adequate number of ATEs to perform all the required mechanical acceptance tests.

- Staff will compare the existing workload in each county to the service areas of all certified ATE and present those results to the Energy Commission for their information.



Is 300 ATTs Enough?

300 ATTs might not be enough to adequately address all projects that would need mechanical acceptance testing if certification were mandatory.

- A specific implementation date may help to resolve this issue.
- Once the Energy Commission does make certification mandatory, it can also set a specific implementation date.
- This should give industry the advance notice they need to be motivated to gain certification.
- Since everyone will know the date, everyone will make plans.



Delay for Small Counties

Delay the implementation for small counties, when larger building centers in California may be ready to proceed.

- Staff determined that such a staggered implementation is not permissible under the current regulations.
- Staff is of the opinion that it would be too confusing for the market place.



Low Enforcement Rate

Some local jurisdictions will not enforce the certification requirement, which would put those contractors who are certified at a disadvantage during the bidding process.

- Staff believes that this can be overcome with education, outreach, and a successful implementation partnership in the major building areas.
- Staff has been working with local jurisdictions in other related efforts.



The Certification Implementation Plan

The four main elements of the proposed plan:

- Monitor the certified ATTs across California Counties.
- Develop the Staff Report for public comment.
- Develop training materials for authorities having jurisdiction and engage in an outreach program.
- Set the implementation date to six months after the Energy Commission approval of the Threshold.



Monitoring

- Staff will continue to review and approve applications to become ATTCPs.
- Staff will monitor the number of certified ATTs in each ATTCP.
- Staff will monitor the identified professions of the certified ATTs.
- Staff will monitor the disclosures of the ATTs and ATEs regarding their individual service areas.



Staff Report

Once staff has determined that all the requirements have been met (unofficially), staff will perform all of the following:

- Require the ATTCPs submit one-time compliance reports.
- Develop and publish a staff report regarding the potential impact on the market place.
- Hold a workshop regarding the staff report and make changes to the report as needed.
- Bring a Resolution forward to an Energy Commission Business Meeting.



AHJ Training Materials

Instructional materials for Local Jurisdictions:

- Staff will develop webinar-based training, recorded webinar training sessions for review, and 10-minute briefings.
- Staff will provide a list of and access to approved ATTCPs.
- Staff will provide a depiction of the appropriate forms and acceptable watermarks.
- The ATTCPs will provide instructions to verify that an ATT holds a valid certification number.
- Facts Sheet, Counter-Cards and BluePrint articles.
- Possible Energy Code Ace training.



Implementation Date

- Staff will recommend that the implementation date be set six months after Energy Commission approval of the Threshold.
- This will give mechanical contractors enough time to complete the training and testing.
- This will also give staff enough time to provide education and outreach to the local jurisdictions and other industry stakeholders.



Benefits of the Plan

- These proposed actions are within the authority of the Energy Commission and the Building Energy Efficiency Standards.
- This plan may enables the ATTCPs, AHJs, and the Energy Commission to implement the certification requirement without significant disruption to industry.
- This plan is in response to issues raised in a February 2016 workshop with industry, ATTCPs, and other stakeholders.
- This plan will allow for public comment on any additional technical assistance that may be needed.



Next Steps

- Monitor compliance status.
- **Public disclosure of the implementation plan.**
- Develop and refine the outreach materials.
- Formally request the one-time compliance status report from the Mechanical ATTCPs.
- Develop and workshop the Staff Report.
- Request approval by the Energy Commission.
- Begin outreach to local jurisdictions.



Public Comment Period

- The Energy Commission encourages use of its electronic commenting system.
 - [E-Comment](#)
 - Email: Include the docket number **13-ATTCP-01** and **Certification Implementation Plan** in the subject line and send to docket@energy.ca.gov
 - Staff will accept written comments until 5:00 p.m. on **September 20, 2019**

Resources:

[2019 Nonresidential Forms](#)

[ATTCP Program](#)

[Online Resource Center:](#)

Joe Loyer

Senior Mechanical Engineer

916-654-4811

Joe.Loyer@energy.ca.gov

