

# Mechanical Acceptance Test Technician Certification Provider

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## Certification Implementation Plan



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**California Energy Commission**



# Agenda

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



# The ATTCP Program

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- 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

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- 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

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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

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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

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- 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](mailto: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:](#)

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