

## DOCKETED

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# **2019 Building Energy Efficiency Standards Pre-Rulemaking Workshop**

# **Acceptance Test Technician Certification Provider Requirements**

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# Acknowledgements

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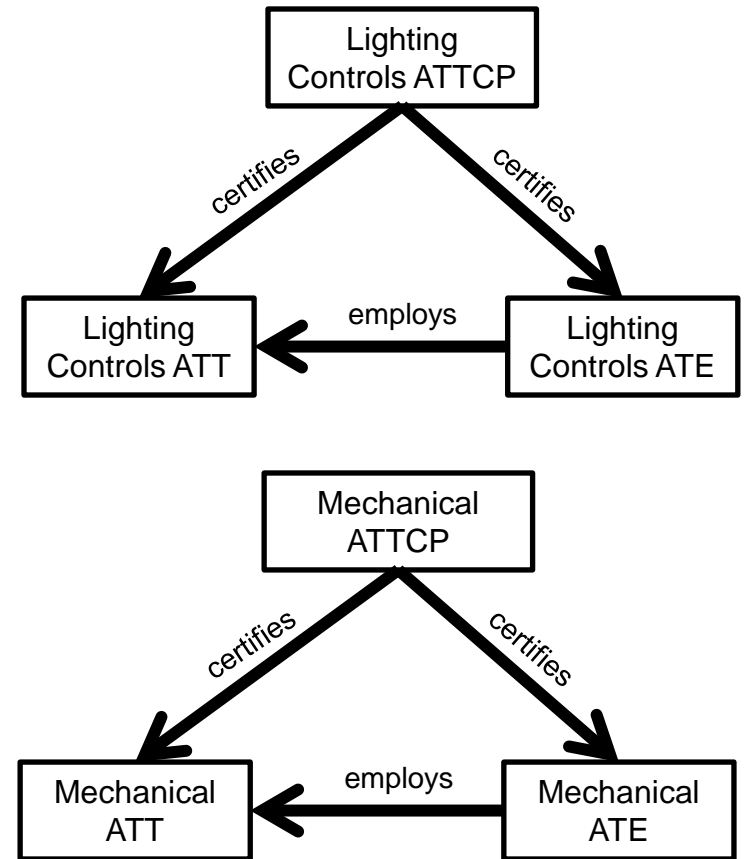
# Agenda

1. Background
2. Overview of Proposed Changes
3. Proposed Code Changes



# Background: Definitions

- **Acceptance Tests** are a set of functional tests that ensures nonresidential lighting controls and mechanical systems work as designed after they are installed.
- **Field technician** is a person who performs acceptance tests and reports the results of the acceptance tests on the Certificate of Acceptance.
- **Acceptance Test Technician (ATT)** is a Field Technician who is certified by an authorized Acceptance Test Technician Certification Provider.
- **Acceptance Test Employer (ATE)** is a person or entity who employs an ATT and is certified by an authorized Acceptance Test Technician Certification Provider.
- **Acceptance Test Technician Certification Provider (ATTCP)** is a professional organization that is approved by the Energy Commission to provide training curricula, certification procedures, complaint resolution (including disciplinary procedures), quality assurance, and accountability measures for ATTs and ATEs.





# Background: History of the ATTCP Program

- 2005 Building Energy Efficiency Standards (Standards) adopted requirements that nonresidential lighting and mechanical installers perform acceptance testing on newly installed lighting controls and mechanical systems to help ensure these systems perform as intended.
- 2013 Standards established new requirements to allow organizations to apply to become ATTCPs to train, certify, and provide oversight for the technicians that perform lighting controls and mechanical acceptance tests, as well as the employers of those technicians.
- ATT and ATE certification requirements shall take effect when the Industry Certification Threshold conditions in Sections 10-103.1(b) and 10-103.2(b) are met, as determined by the Energy Commission.
  - As of June 18, 2014, lighting controls acceptance testing requires a certified ATT.
  - The threshold for mechanical systems has not yet been met.
- 2016 Standards marked the first code cycle that called for ATTCPs to submit update reports to the Energy Commission and recertify their ATTs/ATEs.



Note:

For simplicity, Sections 10-103.1 and 10-103.2 will be denoted as “10-103.[1,2]” when both sections are being referenced.



# Overview of Proposed Substantive Changes

Proposed Substantive Changes	Sections Affected
Provide the Energy Commission with the authority to rescind the Threshold findings	10-103.[1,2](b)
New restrictions for decertified ATTs	10-103.[1,2](c)3B(iii), 10-103.[1,2](c)3G
Requirements for recertification training curricula	10-103.[1,2](c)3B(vi)
Requirements for recertification status	10-103.[1,2](c)3G
Quality assurance discussion (no proposed changes)	10-103.[1,2](c)3F
Expand the annual report to include ATT audit results	10-103.[1,2](d)1
Expand the update report to include all amendments to an approved ATTCP application	10-103.[1,2](d)2





# Overview of Proposed Substantive Changes

Proposed Nonsubstantive Changes	Sections Affected
Define abbreviations for ATTCP, ATT, ATE	10-102, 10-103.[1,2]
Correct the ATTCP scope	10-102, 10-103.[1,2](a)
Minor grammatical corrections	10-103.[1,2]
Require ATE certification numbers	10-103.[1,2](c)3G
Clarify the quality assurance requirements	10-103.[1,2](c)3F
Require underline-strikethrough copy of affected application sections and clean copy of entire application for nonsubstantive amendments	10-103.[1,2](f)1A



# Proposed Substantive Code Changes



## Sections 10-103.[1,2](b): Threshold Maintenance

### Proposed Change:

Provide the Energy Commission with regulatory authority to ensure that the threshold requirements are maintained.

### Justification:

The threshold requirements may deteriorate over time creating a situation where compliance is not possible.



# Sections 10-103.[1,2](c)3B and G: Decertified ATT Restrictions

## Proposed Change:

- When an ATTCP decertifies an ATT, the ATTCP must notify other ATTCPs of the action.
- Decertified Acceptance Test Technicians may not apply for certification with other ATTCPs.
- Decertified ATTs may not submit acceptance testing to any ATTCP.

## Justification:

ATTs that are decertified by one ATTCP may apply to another without addressing the decertification.



## Sections 10-103.[1,2](c)3B(vi): Recertification Training Curricula

### Proposed Change:

Require that ATTCPs develop recertification training curricula consistent with training requirements in Sections 10-103.[1,2](c)3A-C and submit recertification training curricula for Energy Commission approval as part of the update report.

### Justification:

This change allows the Energy Commission to ensure that recertification training scope is scaled appropriately for substantive acceptance testing changes.



## Sections 10-103.[1,2](c)3G: Recertification Status

### Proposed Change:

Require that ATTCPs keep public record of ATT/ATE recertification status and provide verification of recertification status upon request.

### Justification:

ATTs/ATEs are certified and recertified for acceptance testing required under a specific code cycle of the Standards. To prevent ATTs from performing acceptance testing under new code cycles without being recertified, they must be restricted to only those code cycles they have been certified/recertified for.



# Sections 10-103.[1,2](c)3F: Quality Assurance

## Proposed Change: None.

**Quality Assurance and Accountability.** The ATTCP shall describe in their application to the Energy Commission how their certification business practices include quality assurance and accountability measures, including but not limited to independent oversight of the certification processes and procedures, visits to building sites where certified technicians are completing acceptance tests, certification process evaluations, building department surveys to determine acceptance testing effectiveness, and expert review of the training curricula developed for Building Energy Efficiency Standards. The ATTCP shall review a random sample of no less than 1 percent of each Technician's completed compliance forms, and shall perform randomly selected on-site audits of no less than 1 percent of each Technician's completed acceptance tests. Independent oversight may be demonstrated by accreditation under the ISO/IEC 17024 standard.

## Request for public input:

Staff requests that stakeholders and the public identify any issues regarding compliance and make recommendations to modify the language of the Section 10-103.[1,2]3F to resolve those issues.



# Sections 10-103.[1,2](d)1: Annual Reports

## Proposed Change:

Expand annual report requirements to include summarized audits (both paper and on-site).

## Justification:

Requiring the ATTCPs to report their auditing activity will help the Energy Commission verify that quality assurance measures are being followed.





## Sections 10-103.[1,2](d)2: Update Reports

### Proposed Change:

Expand the update report requirements to include all application amendments.

### Justification:

Update reports are limited in scope to training curricula adjustments. Adjustments to an ATTCP's program outside of this scope for newly adopted Standards are not required, but may greatly effect the program. Therefore, the Energy Commission needs the authority to require such modifications.



# Proposed Nonsubstantive Code Changes



## Section 10-102: Abbreviations

### Proposed Change:

Define “ATTCP,” “ATT,” and “ATE” abbreviations in the Section 10-102 definitions.

### Justification:

Terms and abbreviations used in the Building Energy Efficiency Standards should be defined in Section 10-102 or Section 100.1 (as applicable).



## Section 10-102: ATTCP Definition

### Proposed Change:

Correct the definition of ATTCPs to include oversight of ATTs and ATEs.

### Justification:

The ATTCPs have the authority to train, certify, and provide oversight of the ATTs and ATEs. The definition inadvertently excluded oversight.



# Sections 10-103.[1,2]: Grammatical Corrections

## Proposed Changes:

- Use ATTCP, ATT, and ATE abbreviations throughout sections.
- Change references to the ATTCP from plural to singular, as appropriate.
- Change uses of “their” to “its,” as appropriate.

## Justifications:

These minor language changes and grammatical edits are being proposed for consistency and accuracy.



## Sections 10-103.[1,2](a): ATTCP Scope

### Proposed Change:

Correct the scopes in Sections 10-103.1(a) and 10-103.2(a) to include oversight of the ATTs and ATEs.

### Justification:

Sections 10-103.1(c)1, 10-103.1(c)3D-F, 10-103.2(c)1 and 10-103.2(c)3D-F already define the authority of the ATTCPs to include oversight of the ATTs and ATEs.



# Sections 10-103.[1,2](c)3F: Quality Assurance

## Proposed Change:

Clarify the quality assurance regulations requirements.

## Justification:

As written, the regulation is unclear, confusing quality assurance requirements for the ATTCP, the ATTCP Program and the ATT/ATE.



## Sections 10-103.[1,2](c)3G: ATE Certification ID Numbers

### Proposed Change:

Add a requirement that ATEs be issued certification identification numbers.

### Justification:

The ATTCPs currently issue a certification number for ATEs, even though it is not required by the Standards. Staff proposes to codify this as a best-practice.





## Sections 10-103.[1,2](f)1A: Nonsubstantive Application Amendments

### Proposed Change:

Require that for nonsubstantive amendments, the ATTCPs must submit an underline-strikethrough copy of the affected application sections and a clean copy of the entire application.

### Justification:

Without this requirement, staff cannot accurately verify the changes being made. ATTCPs will, upon request, provide staff with these documents when submitting minor changes to their approved ATTCP application. Therefore, this would be a best-practice requirement for all ATTCPs.



# Questions?



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