

IBEW/NECA California State Labor Management Cooperation Committee
Comments on CALCTP Application for Approval as a Lighting Control
Acceptance Test Certification Provider

August 15, 2014

SENT VIA EMAIL

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**Subject: CALCTP Application for Approval as a Lighting Control Acceptance
Test Technician Certification Provider**

Director Oglesby and Mr. Commins:

The California State Labor Management Cooperation Committee for the International Brotherhood of Electrical Workers and the National Electrical Contractors Association (“LMCC”) submit the following comments in support of the California Advanced Lighting Controls Training Program (“CALCTP”) application for approval as a lighting control acceptance test technician certification provider. Properly installed and functioning advanced lighting controls are an essential component to meeting California’s energy efficiency goals. Lighting accounts for almost 40% of a commercial building’s electrical use, double the energy used for cooling. Lighting control acceptance tests performed by trained and experienced technicians will ensure that advanced lighting controls are installed and operating correctly so they can achieve their desired energy saving potential. Accordingly, the LMCC is very interested in ensuring the success and effectiveness of the new certification requirements for lighting control acceptance test technicians.

Certification for Lighting Control Acceptance Test Technicians was enacted by the Commission in response to testimony that training, certification and quality control of acceptance test technicians were needed to make the Commission’s acceptance test requirements meaningful, reliable and cost-effective. Training and quality control oversight of certified technicians is the responsibility of the acceptance test technician certification provider. In order to ensure the success and reliability of the certification program, the Commission should only approve

certification providers that have demonstrated sufficient experience, reputation and success in running similar programs. CALCTP has these qualities.

CALCTP Brings Unparalleled Reputation, Experience and Credibility to the Lighting Control Certification Program

When the Commission adopted its lighting control acceptance test technician certification requirements, it prequalified CALCTP as a certification provider based upon CALCTP's history, experience and reputation as an organization that already provided high quality training and certification of lighting control installers. CALCTP has seven years of experience training and certifying advanced lighting control installers and is overseen by an advisory board consisting of representatives of all of the major utilities, the Chancellor's Office of the Community College System and the California Lighting Technology Center-UC Davis. Through its installer certification program, CALCTP has demonstrated that it has the knowledge, experience and ability to run a quality and reliable acceptance test certification program.

CALCTP's Training Has Been Validated for Content, Reliability and Lack of Bias

It is standard industry practice to require professional certification tests to be evaluated by a test validation professional for reliability, validity and lack of bias. (See U.S. Department of Labor, Testing and Assessment: Employer's Guide to Good Practices (2000), available at http://www.onetcenter.org/dl_files/empTestAsse.pdf; see also The Standards for Educational and Psychological Testing (AERA, APA, & NCME, 1999); Institute for Credentialing Excellence, Background Information *ICE 1100* 2010 (E) – Standard for Assessment-Based Certificate Programs, at pp. 24-27, available at <http://www.credentialingexcellence.org/p/cm/ld/fid=99>; and ISO 17024 examination guidelines.) For example, California requires certification examinations for electricians to "be validated by an independent test validation organization." (Cal. Code Regs., tit. 8, § 291.3(b).)

Test validation is critical to ensuring a fair, reliable and valid certification process. The Commission should not approve any provider until it demonstrates its exams have been validated by a test validation professional.

The CALCTP application demonstrates that: (1) the examinations have been validated by a test validation professional to ensure sufficient rigor, reliability and lack of bias; (2) there are multiple versions of the tests and the same test questions are not used every time; (3) new test questions are continuously developed to ensure test answers are not passed around; (4) exams are proctored and secure; and (5) the test results are retained for at least five years.

CALCTP Has Enacted Verification Procedures to Ensure Compliance with the Commission's Prequalification Requirements

LMCC supports strong prequalification requirements because highly qualified applicants with a pre-existing background in lighting controls and systems will ensure the success of the new certification requirements. CALCTP's application demonstrates that all applicants will meet the Commission's regulatory requirement to have at least three years of *verifiable* professional experience and expertise in lighting controls and electrical systems; and that the professional

industry groups eligible for certification are professions related to the design, installation, testing or commissioning of these systems. CALCTP verifies this experience by requiring that applicants are required to provide verification letters from employers or other evidence to verify their work experience claim.

In addition, consistent with Section 10-103-A, subd. (b)(2), CALCTP only recognizes the following professions as providing *verifiable* professional experience and expertise in designing, installing, testing, adjusting or commissioning lighting controls systems: (1) electrical contractors; (2) certified general electricians; (3) professional engineers; (4) controls installation and startup contractors; and (5) certified commissioning professionals. The LMCC asks that the Commission not approve expansion of this list of qualified professions by CALCTP or any other Provider without first holding stakeholder meetings to assess the likelihood of other proposed professional designations providing similar verifiable professional experience and expertise.

CALCTP Provides for Statistically Significant Random Quality Assurance Audits and Sets Forth Specific Protocols for Responding to Failed Audits

Because Lighting Control Acceptance Test Technicians are not required to be third party testers, a rigorous and meaningful quality assurance program by the certification provider is essential to ensuring the reliability and success of the certification program. Random field inspections should be required and any failed paper audit, scheduled field inspection or random field inspection should trigger additional random field inspections within the next few jobs.

The LMCC supports the CALCTP approach to quality assurance for this program, which requires random audits at an initial rate that will provide a 95 to 98 percent confidence level at first to ensure that any initial issues with noncompliance are identified and addressed. Under this program, LMCC contractors will be subject to 6% paper audits and 6% random field inspections during the first three years of the program, dropping down to 4% paper audits and 4% random field inspections in years 4-5 and 2% paper audits and 2% random field inspections after that.

For comparison, the HERS program requires random field inspections at a rate of 1% where the HERS raters are third party inspectors and inspecting all installations. However, when builders take advantage of the less rigorous Building Performance Contractor exception for Energy-Rated Homes, the number of random field inspections jumps to 5%. Because Lighting Control Acceptance Test Technicians are not required to be independent third parties from the contractor, the number of random field inspections should be closer to the level required under the Building Performance Contractor exception at least for the first few years of a Provider's certification program. As long as a Provider ensures adequate pre-qualification requirements, adequate training, and sufficient quality assurance audits, there should be no need to require Lighting Control Acceptance Test Technicians to be third party.

Because quality assurance audits significantly drive up the costs for contractors, acceptance test certification providers' quality assurance programs are going to be a race to whatever bottom the Commission sets. If other providers implement a much less reliable, but much cheaper quality assurance program, CALCTP contractors will have to pressure CALCTP to similarly reduce the amount of random audits that it requires in order to keep their acceptance test costs down and remain competitive. Accordingly, we encourage the Commission to establish a minimum level

of random field inspections during the first few years of the program that all providers must meet. Whatever level is established should be supported by evidence that establishes the confidence level of the program.

Finally, it is not clear if CALCTP or other providers are required to provide reports on all failed paper audits and field inspections (and the resultant remedial actions) to the Commission. We would request that all providers be required to provide such reports.

LMCC Members Have Uniformly Provided Positive Feedback on CALCTP's Training and Certification Program

In order to help the Commission achieve its goal of ensuring lighting control acceptance tests are performed by trained, qualified personnel, many of the LMCC's member contractors and electricians took it upon themselves to be early adopters of the CALCTP Acceptance Test Technician certification. The feedback from our members on this program has been extremely positive. Members with years of advanced lighting control installation experience reported that, despite their experience, this training was essential to ensuring proper performance of acceptance tests. They reported that the breadth equipment included on CALCTP lab boards provided familiarity with a broad range of systems, greatly reducing the likelihood they would encounter unfamiliar field conditions.

Conclusion

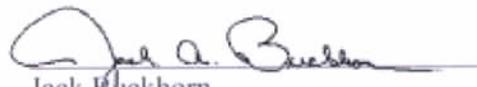
The California State Labor Management Cooperation Committee thanks the Commission for the opportunity to review and comment on its lighting control acceptance test technician certification provider applications. As we stated in our prior comments on the NCLAA application, the providers are the gatekeepers for ensuring a successful and reliable certification program. We urge the Commission to set the highest possible standards for these providers. The success of this program depends not just on the content of the curriculum, but also upon requiring qualified and experienced certification providers, high prequalification standards, rigorous and reliable tests and test procedures, and meaningful quality assurance audit requirements.

CALCTP's application demonstrates that it has developed its program in compliance with the highest standards for training and certification. We support approval of CALCTP's application.

Sincerely,



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