National Lighting Contractors Association of America

3301 East Hill Street, #406 | Signal Hill | California | 90755

October 16, 2014

Robert Oglesby
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, California 95814
Rob.Oglesby@energy.ca.gov

Tav Commins
Mechanical Engineer
California Energy Commission
1516 Ninth Street
Sacramento, California 95814
Tav.Commins@energy.ca.gov

Subject: Questions regarding CALCTP interim approval certification and recent arguments for NLCAA disapproval as a Lighting Controls Acceptance Test Technician Certified Provider.

Tav Commins,

National Lighting Contractors Association of America (NLCAA) questions that the required Industry Certification threshold was met on June 18, 2014 as stated by CALCTP. The Building Efficiency Standards clearly states the conditions for interim approval below:

"Interim approval shall be conditioned upon submittal of an application that contains the information required by subdivision (c)(1)-(3), including documentation demonstrating that the certification includes training and testing on the Building Energy Efficiency Standards lighting control acceptance testing procedures and the Building Energy Efficiency Standards acceptance testing compliance documentation for lighting control systems"

A review of the CALCTP LIGHTING ATTCP APPLICATION §10-103-A Evaluation Form shows items from sections [§10-103-A(c)3,G] and [§10-103-A(d)] that clearly were not completed until 8/1/2014. We believe the CALCTP claim of interim approval on June 18, 2014 was inappropriate. NLCAA feels that CALCTP overstepped their role by certifying several hundred acceptance test technicians before CALCTP achieved interim approval. In addition, non-adherence to the requirements and their respective timelines is a violation to an agreed upon process that was set up to ensure the integrity of the approval process and the industry.

National Lighting Contractors Association of America

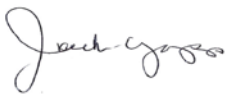
3301 East Hill Street, #406 | Signal Hill | California | 90755

NLCAA , on the other hand, worked diligently trough the process to fulfill all of the CEC requirements for certification as a Lighting Controls Acceptance Test Technician Certified Provider. Then when NLCAA was put on the agenda for certification, a barrage of verbiage from NECA and the IBEW surfaced to prevent the certification. NLCAA respects the role of the CEC and went about our certification process in an open and positive manner. NLCAA thoroughly reviewed all of the requirements in the Building Energy Efficiency Standards as we developed our training and testing software. Through this process we have shared our findings with the CEC with an end goal of providing qualified resources to ensure the success of advance lighting systems in the state of California.

NLCAA's mission is to provide these qualified resources via our training and software irrespective of the union status of our students. We do not view ourselves as "competition" to NECA and IBEW but rather as simply another resource to help California succeed in implementing state of the art lighting systems. An objective look at the existing Lighting Controls Acceptance Test Technician Certified Providers shows that there is a need for more providers, especially those that are available for non-union technicians. Should this not be the case then the need will dictate the size of the provider population as is the case with any free enterprise system.

NLCAA believes it is this view of "competition" that is hampering our approval process. It was this same view that led CALCTP to remove us from their list of training resources, not our experience or technical expertise. It is our sincere hope that the CEC can review our situation and bring objectivity back into the argument. NLCAA feels that we satisfied the CEC's requirements and respectfully request that we be put back up for certification.

Yours truly,



Vice President of Training
310-890-0878

The California Advanced Lighting Controls Training Program
CALCTP

April 29, 2014

Mr. Jack Yapp
California Electrical Training, Inc. (CET)
3301 E. Hill Street, Suite 408
Signal Hill, CA 90755

Re: CET Decertification as a CALCTP Certified Training Site

Mr. Yapp:

We understand that you have developed your own lighting controls acceptance test technician curriculum that is in direct competition with the California Advanced Lighting Controls Training Program (CALCTP) that you have been certified to teach.

The CALCTP Board does not feel that it is appropriate for you to teach both your own lighting controls acceptance test technician curriculum and the CALCTP acceptance test technician curriculum. Furthermore, your decision to not share your curriculum with the CALCTP curriculum committee as agreed upon raises issues about copyright infringement and intellectual property infringement. Therefore, the CALCTP Board hereby decertifies CET as a CALCTP approved training site for both the CALCTP installer and the CALCTP acceptance test curriculums.

The CALCTP Board understands that you may have additional CALCTP acceptance test classes underway and the Board does not wish to interfere with the ongoing training of any acceptance test technician candidate. For this reason, the CALCTP Board is allowing CET to complete all scheduled CALCTP classes by Saturday, May 31st, 2014. After that date, CET will no longer be allowed to operate, teach, advertise, or market itself as a CALCTP certified training site.

Furthermore, we request that you return all training materials including CDs and flash drives that have been provided to you by CALCTP, and all copies of CALCTP materials, to the attention of Mr. Mark Ouellette at our administrative offices at: 601 W. 5th Street, Suite 900, Los Angeles, CA 90071.

Sincerely,

Bernie Kotlier
CALCTP Co-Chair

Doug Avery
CALCTP Co-Chair

International Brotherhood of Electrical Workers

Edwin D. Hill
International President

Sam Chilia
International Secretary - Treasurer

Michael Mowrey
International Vice President

Ninth District

November 1, 2013

TO: CALCTP Certified Installers

Re. Work Opportunities in Acceptance Testing – TIME SENSITIVE

Dear Brothers and Sisters:

As a California Advanced Lighting Controls Training Program (CALCTP) certified installer, you have a special opportunity to qualify for additional work and income.

Beginning January 1st, 2014, the California state building code energy efficiency section - Title 24 - will be updated to require lighting controls in all new commercial, and many existing buildings, by law. The new code will also require acceptance testing of those lighting controls installations by state certified lighting acceptance testing field testers.

Currently, CALCTP is the only organization recognized by the State to train and certify acceptance testers in a special CALCTP Acceptance Testing (CALCTP-AT) course. Your CALCTP installer (CALCTP-I) certificate provides a number of possible special advantages:

- A shorter class. (The non CALCTP-I class will be about twice as long)
- A head start in being certified as an acceptance tester before January 1st
- Additional work hours because of your special qualification
- In some jurisdictions, a subsidy may be offered for passing the class
- In some jurisdictions, a specialty job call may be utilized for acceptance testers

To realize these advantages you need to take the CALCTP class in November or early December, so prompt action is necessary. Those who wait may lose work opportunities, and could be required by the State to take a longer class and pay additional registration fees.

I urge you to sign up now for a CALCTP-AT class. Please see the attached spreadsheet of upcoming classes at JATCs around the state. If your JATC is not on the list, call your training director for scheduling information, or enroll in a class at another JATC in your region.

Acceptance testing is a good opportunity for you that has been created by IBEW and NECA support of CALCTP. I trust that you will take advantage of it and enjoy the benefits.

Fraternally,

Michael Mowrey
International Vice President