SERRANO
ELECTRIC INC.

September 8, 2014

Mr, Robert Oglesby, Executive Director
Mr. Tav Commins, Mechanical Engineer
Mr. Daniel Wong
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, CA 95814

Subject: ***NLCAA request for Certified Provider or Interim Provider Status***

Dear Sirs,

I am writing once again to ***URGE*** the California Energy Commission ("CEC") grant either Certified Provider Status or Interim Provider Status to the National Lighting Contractors Association of America ("NLCAA"). Despite NLCAA's submission of a completed Lighting Controls Acceptance Test Technician Certification Provider ("ATTCP") application in accordance with 2013 Building Energy Efficiency Regulations Section 10-103, CEC staff recommendation to award Certification Status on July 22, 2014, and tentative placement on the agenda for the last three CEC monthly meetings, NLCAA's application has not been acted on by the CEC. To date, there is only one organization, CALCTP, with Interim Provider status for the entire state of California!

The conduct of the CEC has been detrimental to the citizens of California, NLCAA and the contracting community:

1. Having only one Lighting Controls Acceptance Test Technician Provider creates a monopoly condition forcing ALL contractors to participate in the union based Interim Provider program.
2. Documentation by nonunion contractors demonstrates a bias against nonunion applicants, delaying certification, when seeking Lighting Controls Acceptance Test Technician Certification from CALCTP. As a result, nonunion

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to the citizens of California, resulting in financial hardship to individual electricians as well as contractors unable to timely obtain certification.

3. The citizens of California are forced to pay higher fees for lighting controls services due to the arbitrarily limited number of certified technicians.
4. NLCAA has expended over $350,000 developing hardware and software to meet the requirements of becoming a Certified Provider. Despite staff recommendation to award Certified Provider status, no action has been taken, thus preventing NLCAA from providing services to the contracting community and unable to conduct business.

Clearly, this is an untenable condition that can be easily rectified by the CEC. Every day the CEC allows this condition to remain in effect harms the citizens of California. I am respectfully requesting the CEC award Interim Provider Status to NLCAA and allow NLCAA's Certified Provider application to be presented to the CEC at its next meeting.

As of today, we have several jobs that need certification by the end of this month. We have paid for four of our Journeymen Electricians to go through all the mandatory training at the NLCAA but are being road blocked by the California Energy Commission. This has now become a financial hardship on both our company and our client. We need your support to stop road blocking the NLCAA and do what is fair.

If I can provide any clarification please contact me at 408-986-1570. Thank you for your time and attention to this matter.

Sincerely,

DANIEL L. SERRANO

cc: Jack Yapp
Robert O'Donohue