

## DOCKETED

<b>Docket Number:</b>	16-MISC-01
<b>Project Title:</b>	DCBO Selection Process Workshop
<b>TN #:</b>	212430
<b>Document Title:</b>	Scott Seipel Comments: Docket No. 16-MISC-01
<b>Description:</b>	California Energy Commission Request for Qualifications Delegate Chief Building Official Services for the STEP Division
<b>Filer:</b>	System
<b>Organization:</b>	Scott Seipel
<b>Submitter Role:</b>	Applicant
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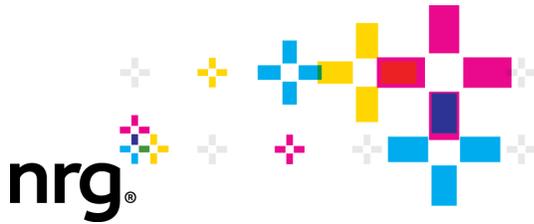
*Comment Received From: Scott Seipel*

*Submitted On: 7/22/2016*

*Docket Number: 16-MISC-01*

**Docket No. 16-MISC-01**

*Additional submitted attachment is included below.*



**NRG Energy, Inc.**  
5790 Fleet Street, Suite 200  
Carlsbad, CA 92008

June 22, 2016

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 16-MISC-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

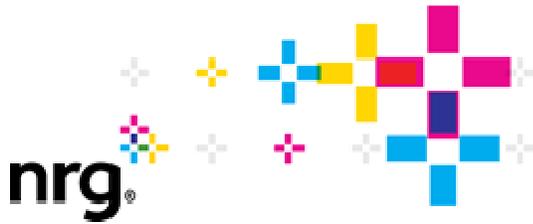
RE: California Energy Commission Request for Qualifications Delegate Chief Building Official Services for the STEP Division, Docket No. 16-MISC-01

Dear California Energy Commission:

NRG Energy, Inc. (NRG) provides the following comments and questions on the California Energy Commission's (CEC) recent request for quotation (RFQ) for Delegate Chief Building Official (DCBO) services docketed on June 28, 2016. NRG owns and operates several CEC licensed facilities in California. NRG has worked closely with CEC DCBOs on the construction of new, redevelopment, and amended CEC licensed facilities.

NRG attended the CEC stakeholder roundtable workshop held July 8, 2016 and has reviewed the CEC draft scope for "On-Call" and "Project Specific" work. NRG provides the following comments and questions:

- 1) Conflict of interest minimum requirements: The minimum requirements for evaluating conflicts of interest only includes a statement that no income has been received from work on Project Owner applications (to CEC) and/or their subcontractors. NRG requests that the CEC also evaluate the DCBOs potential conflicts that may arise from work performed for other governmental or regulatory agencies that interact with Project Owner's projects. Such conflicts may arise on a project by project basis.
- 2) Cost: The procurement process should include the DCBO's submittal of current rate schedules. We request the CEC consider a bid process amongst the pre-qualified DCBOs for Project Specific work. We would also like the CEC to consider establishing a framework of allowable expenses? (Example: approved hotels, size of rental car, amount of per diem, etc.)



- 3) On-Call Services: CEC should consider the ability to issue one or two year extensions to the purchase order beyond the 24 month performance period.
- 4) CEC as "Third Party": The CEC should provide clear direction on how they can facilitate dispute resolution between Project Owners, design engineering, and DCBO.
- 5) 24 month purchase order: Question: Will the Project Owner be able to hire DCBO's directly outside of the CEC purchase order process, assuming they met the CEC qualifications criteria? This could be critical for facilities that have already had one DCBO provide services/approvals and could help expedite review time on projects that DCBO already has experience with.
- 6) Question: Will the CEC provide a common or routine evaluation process and performance metrics for stakeholders to provide subjective and objective feedback to the CEC?
- 7) Question: Will the Project Specific DCBO's be assigned from a qualified pool, or will there be a bidding process from the pool of qualified DCBO's?

We appreciate the opportunity to provide feedback on the RFQ process. If you have any questions, please do not hesitate to contact me at 760-707-6833 or via email at [George.Piantka@nrg.com](mailto:George.Piantka@nrg.com)

Best Regards,

George Piantka, PE  
Sr. Director, Regulatory Environmental Services

cc: