

FAQ: What agency(ies) are approved to perform commissioning work required under 2018 IECC C408?

Background:

To validate that building systems perform as intended, the International Energy Conservation Code (IECC) Section C408 requires all mechanical and service water heating systems, see IECC Section C408.2 for Exceptions, to undergo System Commissioning. This is to ensure that building systems perform in the most energy efficient manner possible by checking that the final installation of such systems meet the operating criteria set forth in the design and construction documents.

System Commissioning is a multi-stage effort and may involve various parties including the Design Professional in Responsible Charge of each respective building system, the Contractor(s) performing the work, testing and balancing (TAB) agency(ies), and approved Commissioning Agency(ies).

Due to the multiple parties involved, to make sure System Commissioning is performing in an objective manner, IECC Section C408.2 stipulates that only design professionals and approved agencies may perform System Commissioning – Contractors may NOT act as the System Commissioning agency on any project where they performed construction work. IECC Section C408.2 states:

C408.2 Mechanical systems and service water-heating systems commissioning and completion requirements. Prior to the final mechanical and plumbing inspections, the registered design professional or approved agency shall provide evidence of mechanical systems commissioning and completion in accordance with the provisions of this section.

Furthermore, as the Department has sole responsibility to approve any agency(ies) wishing to perform System Commissioning work, the Department's policy is to establish minimum qualification requirements for these as set forth below. This also applies to registered Design Professionals in Responsible Charge (DPRC) that wish to perform System Commissioning – when a DPRC is retained to perform System Commissioning work on systems that they designed, such DPRC MUST meet the minimum qualification requirements set forth below.”

Answer:

System Commissioning can be performed by any Agency that maintains active and current Certifications in any one of the following categories as administered by the associated Certifying body. Registered design professionals in responsible charge (DPRC) may also perform System Commissioning activities provided they also maintain active and current Certification as listed below.

Regardless of certifications held, Contractors may NOT act as the System Commissioning Agency on any project where they performed construction work.

Entities performing System Commissioning must hold one of the following Certifications.

- American Commissioning Group (ACG) Certified Commissioning Authority (CxA)
- Association of Energy Engineers (AEE) Certified Building Commissioning Professional (CBCP)
- American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Building Commissioning Professional (BCxP)
- Building Commissioning Association (BCA) Certified Commissioning Professional (CCP)
- National Environmental Balancing Bureau (NEBB) Commissioning Process Professional (CxPP)

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Questions?

Call 311 or (215) 686-8686 (if outside Philadelphia) or submit a permit-related question online via <https://form.jotform.com/81494420572154>.

Disclaimer:

This interpretation, policy or code application is intended to provide guidance to staff for consistency of review and is subject to change without notice. Application of this interpretation, policy or code application to specific projects may vary. There may be other ways to comply with the Code. If so, you are not required to use this method. You may want to investigate other options, or consult with a professional identifying an equally code compliant solution.

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