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| Docket Number: | 25-BSTD-01 |
| Project Title: | 2025 Energy Code Compliance Provider Applications |
| TN #: | 266685 |
| Document Title: | Executive Director Recommendation to Approve the CHEERS ECC-Provider and 2025 Energy Code Data Registry Applications |
| Description: | A memorandum from the CEC's executive director to the California Energy Commission recommending to (1) approve California Home Energy Efficiency Rating Services (CHEERS) as an Energy Code Compliance (ECC) Provider, and (2) approve the CHEERS 2025 Energy Code residential data registry. The document includes a staff evaluation to support the recommendation. |
| Filer: | Armando Ramirez |
| Organization: | California Energy Commission |
| Submitter Role: | Commission Staff |
| Submission Date: | 10/20/2025 1:42:54 PM |
| Docketed Date: | 10/20/2025 |

MEMORANDUM

TO: California Energy Commission

FROM: Drew Bohan
Executive Director
California Energy Commission
715 P Street
Sacramento, California 95814

SUBJECT: Recommendation to approve the CHEERS Energy Code Compliance Provider application and to approve the CHEERS 2025 Energy Code residential data registry

DATE: October 17, 2025

I. BACKGROUND

The Energy Code Compliance (ECC) Program regulations¹ support projects in demonstrating compliance with the 2025 Energy Code through required testing and documentation. The ECC Program helps ensure both code compliance and the quality installation of efficiency measures that consumers expect. The ECC program is administered by ECC-Providers that train and certify ECC-Raters to determine whether installed energy efficiency measures meet Energy Code requirements.

The 2025 Energy Code defines an ECC-Provider as "an organization approved by the Commission to administer the ECC program pursuant to the requirements of Section 10-103.3"². It also defines an approval process, as well as functional and technical requirements of a residential data registry.³ Notably, "[f]or residential compliance document registration, the Registration Provider shall be approved in accordance with the requirements in Section JA7.8 and shall also be an ECC-Provider approved by the Energy Commission."⁴

California Home Energy Efficiency Rating Services (CHEERS) has submitted an ECC-Provider Application and a 2025 Energy Code Residential Data Registry Application for California Energy Commission (CEC) approval. Application approvals require the CEC's executive director to make a recommendation to the CEC for consideration at a public meeting. This memorandum includes a recommendation to approve both the ECC-Provider application and the Residential Data Registry application. Staff's evaluations of the applications are attached as Exhibit 1.

II. APPLICATION SEQUENCE

The application process from submission to recommendation occurred as follows:

1 California Code of Regulations, title 24, part 1, chapter 10, section 10-103.3

2 Id., section 10-102

3 Id., section 10-109(i)1A

4 2025 Reference Appendices, Joint Appendix section JA7.4.1 Registration Provider

- On May 30, 2025, CHEERS submitted its initial application components to the CEC, requesting to be approved as an ECC-Provider for the 2025 Energy Code.
- On August 13, 2025, CHEERS applied for approval of its 2025 Energy Code residential data registry.
- CEC staff reviewed the application materials and communicated with CHEERS to ensure all application and provider requirements were met.
- Between June and September 2025, CHEERS submitted additional application materials that revised or amended previous filings, and to complete the provider and registry applications.
- Following the CHEERS filing on September 8, 2025, CEC staff determined the application to be complete. However, CHEERS submitted an additional application component to expand its registry application scope on September 18, 2025. Staff found this submission to be complete as well.
- Pursuant to Title 20 of the California Code of Regulations (CCR), section 1674(c)(2), and Title 24, section 10-110(b), staff published a notice on September 25, 2025, to docket log [25-BSTD-01](#).⁵ The notice provided an opportunity for public review and comment.
- No comments were received by the end of the comment period on October 10, 2025.
- CEC staff reviewed all submitted application materials and concluded that CHEERS has met the applicable requirements in the 2025 Energy Code Compliance Program regulations and 2025 data registry requirements. For reference, CEC staff guidance regarding application requirements is [available on the CEC website](#).⁶

III. CONCLUSION AND RECOMMENDATION

Pursuant to Title 20, section 1674(c)4 (as amended on January 1, 2024), I recommend CEC approval of the CHEERS 2025 Energy Code ECC-Provider application.

Pursuant to Title 24, section 10-110(e), I recommend CEC approval of the CHEERS 2025 Energy Code residential data registry.

Based on CEC staff review and evaluation of the CHEERS applications, I recommend that the CEC confirm these findings, approve CHEERS as an ECC-Provider for the 2025 Energy Code cycle, and approve the CHEERS 2025 residential data registry application within the scope of approval described in Exhibit A.



October 17, 2025

Drew Bohan
Executive Director
California Energy Commission

Date

⁵ Available at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=25-BSTD-01>

⁶ Publication Number CEC-400-2025-012. Available at <https://www.energy.ca.gov/programs-and-topics/programs/energy-code-compliance-program/ecc-providers-energy-code-compliance>

EXHIBIT 1

CEC STAFF EVALUATION

CHEERS 2025 ENERGY CODE COMPLIANCE PROVIDER AND RESIDENTIAL DATA REGISTRY APPLICATIONS

SCOPE OF APPROVAL

(1) ECC-Provider Application Scope

CHEERS has submitted evidence that for the 2025 Energy Code cycle, it will comply with ECC Program provider responsibilities expressed in Title 24, Part 1, section 10-103.3, and elsewhere in Title 24, Part 6. CHEERS has requested CEC approval to provide the following services:

Certification Responsibilities

- ECC-Rater, with ECC-Rater Agreement
- ECC-Rater Company, with ECC-Rater Company Agreement

Classroom Training

- New Rater Full Training
- Update Training
- Rater Company Training

Practical Training

- Full ECC-Rater Training
- Re-training under quality assurance processes

Exam Types

- Written (for full and update training)
- Practical (for full training)
- Challenge (for qualified candidates)

Quality Assurance (QA)

- QA Operations and Evaluation Personnel
- Reviews to evaluate ECC-Raters. These include onsite audits, shadow audits, and desk audits.
- ECC-Rater and ECC-Rater Company Discipline
- Disciplinary Notices
- “Exemplary Rater” designations⁷
- Quarterly and Annual reporting

Other Responsibilities

- Data collection, retention, and reporting
- Public and CEC-initiated complaint handling, resolution, and reporting
- CEC requests (including investigations)
- Provider Discipline

⁷ California Code of Regulations, title 24, part 1, chapter 10, section 10-103.3(d)5B

- Document Registration
- Data Registry Coordination
- Handling falsified data entered into the registry, or “conflicted data”
- Prohibitions on conflict of interest between providers, raters, and contractors.

(2) Residential Data Registry Scope

The CHEERS registry will offer production of certificates of compliance, installation, and verification for when a building project’s scope requires any field verification and diagnostic testing (FV&DT). Per the Energy Code, FV&DT could be required in low-rise residential buildings, high-rise residential buildings, and some nonresidential buildings.

In addition to performance method certificates of compliance, registered form types are listed in Appendix A of the [2025 Data Registry Requirements Manual](#) (publication number CEC-400-2025-004).⁸ CHEERS has included all of those documents in its application, with a few exclusions that are outside of the CHEERS application scope. See Table A-1: Excluded Document Types.

Select abbreviations for terms formally defined in Title 24, Part 1, section 10-103(a) and Part 6, section 100.1:

- Low-rise Multifamily (LRMF) refers to residential buildings having more than two attached dwelling units and three or fewer habitable stories.
- Single-Family (SF) refers to attached or detached dwelling units that do not exceed two dwelling units, as well as townhouses.
- Certificates of compliance will be designated as CF1R (SF) or LMCC (LRMF) in the form numbering.
- Certificates of installation will be designated as CF2R (SF) or LMCI (LRMF) in the form numbering.
- Certificates of compliance will be designated as CF3R (SF) or LMCV (LRMF), as well as NRCV (nonresidential) in the form numbering.

Table A-1: Excluded Document Types

| Form Number | Document Used for Prescriptive Compliance | Is Registration Required? |
|----------------|---|-----------------------------------|
| LMCC-ENV-01-E | Envelope | Yes, if compliance requires FV&DT |
| LMCC-MCH-01-E | Mechanical | Yes, if compliance requires FV&DT |
| LMCI-MCH-01c-E | Space Conditioning Systems, Prescriptive New Construction | Yes. Follows LMCC-MCH-01-E |
| LMCC-PLB-01-E | Water Heating | Yes, if compliance requires FV&DT |
| LMCC-CXR-01 | Commissioning | No |
| LMCC-ELC-01 | Electrical Power Distribution and Electric Ready | No |

⁸ Available at <https://www.energy.ca.gov/publications/2025/2025-data-registry-requirements-manual-2025-building-energy-efficiency-standards>

| Form Number | Document Used for Prescriptive Compliance | Is Registration Required? |
|-------------|---|---------------------------|
| LMCC-LTI-01 | Indoor Lighting | No |
| LMCC-LTO-01 | Outdoor Lighting | No |
| LMCC-LTS-01 | Sign Lighting | No |
| LMCC-PRC-01 | Covered Processes | No |
| LMCC-SAB-01 | Solar and Battery | No |

Source: CEC staff.

Prescriptive-compliance space conditioning system alterations can utilize the LMCC-MCH-02-E. Similar to a past CEC guidance, enforcement agencies may consider waiving registration requirements until the excluded prescriptive forms are available for registration.⁹ ECC-verifications must be completed regardless.

Staff suggests using the alternative to prescriptive compliance in LRMF projects. Designers and builders may consider using the performance approach to compliance for new construction and alterations to existing buildings in low-rise multifamily buildings.¹⁰ The CHEERS registry will be capable of registering the LMCC-PRF-01-E, which is suitable for new construction, additions, and alterations projects.

CEC STAFF ANALYSIS

(1) ECC-Provider Application

Until the 2025 Energy Code takes effect on January 1, 2026, ECC-Provider applicants may follow FV&DT provisions from the effective Home Energy Efficiency Rating System (HERS) Program regulations. At the applicant’s discretion, the CHEERS application was structured in accordance with the full application requirements from the ECC Program regulations. These requirements begin with Title 24, Part 1, section 10-103.3(c), “ECC-Provider Approval.” This approach will better support subsequent applications to modify this approval and to update the approval for the next triennial code cycle.

Staff found that CHEERS submitted the necessary explanations and evidence in its application. The applicant must define a scope of services, identify itself and its business relationships, and produce evidence that the applicant can and will satisfy program requirements.

The application shows how CHEERS will administer training and certification of raters and rater companies. CHEERS has included proctoring software for exam proctoring. The training program offers a challenge exam, which is available to raters who are “fully trained” under the 2022 Energy Code. CHEERS submitted online classroom training courses and associated exams. The CHEERS training program includes two training laboratories for administering practical training and examinations. Certification of raters and rater companies requires a signed “certification agreement” between the candidate and CHEERS.

⁹ [Regulatory Advisory for Low-Rise Multifamily Compliance Forms for the 2022 Energy Code](#)

¹⁰ Requirements for each compliance approach for different building types are referenced in Title 24, part 6, section 100.0(e). The performance approach standards for multifamily buildings are given in section 170.1 for newly constructed buildings, section 180.1(b) for additions, and 180.2(c) for alterations.

The application also outlines the oversight process for quality assurance, which involves evaluating the quality of work by CHEERS-certified raters through various means.¹¹ Evaluations can lead to rater and rater company discipline, which may progress through a series of disciplinary steps if necessary:^{12,13}

- Notice of Violation
- Notice of Probation
- Notice of Suspension
- Notice of Decertification

CHEERS filed the following exhibits to meet these requirements:

Table A-2: CHEERS ECC-Provider Application Submissions

| Date Submitted | Document Title | TN | Visibility |
|-----------------------|--|-----------|-------------------|
| 9/5/25 | Ex A Summary of Evidence Amended | 266287 | Confidential |
| 5/30/25 | 2025 ECC Provider Application - Exhibit B (CHEERS Articles of Incorporation) | 264815 | Public |
| 8/26/25 | 2025 ECC Provider Application (Exhibit B.1 CHEERS Certificate of Amendment) | 265781 | Public |
| 5/30/25 | Ex C - Quality Assurance Program | 264685 | Confidential |
| 9/5/25 | Ex C1 QA Program Supplement | 266288 | Confidential |
| 9/5/25 | Ex C2 QA Program Fees | 266289 | Confidential |
| 5/30/25 | Ex D - CHEERS QA Reviewer Qualifications | 264686 | Confidential |
| 5/30/25 | Ex E - ECC-Rater Company Training | 264687 | Confidential |
| 6/3/25 | Ex F - ECC Program Update Training | 264605 | Confidential |
| 5/30/25 | Ex G - ECC Program Administration Documents | 264683 | Confidential |
| 9/5/25 | Exhibit Gv2 Admin Docs Revised | 266290 | Confidential |
| 9/5/25 | Ex H - CHEERS ECC Training Program | 266291 | Confidential |
| 7/8/25 | Ex H1 - ECC Rater Training Program Laboratory | 265213 | Confidential |

11 Title 24, part 1, chapter 10, section 10-103.3(d)5C

12 Id., section 10-103.3(d)7

13 Id., section 10-103.3(d)15

| Date Submitted | Document Title | TN | Visibility |
|----------------|---|--------|--------------|
| 7/14/25 | Ex H2a ECC Rater Classroom Course | 265629 | Confidential |
| 7/14/25 | Ex H2b ECC Rater Classroom Exam | 265630 | Confidential |
| 9/5/25 | Ex H3 - Proctoring | 265883 | Public |
| 9/5/25 | Ex H4 - Challenge Exam | 265882 | Public |
| 7/1/25 | Ex H5 - Certification Agreement | 265632 | Confidential |
| 9/5/25 | CHEERS Exhibit I Training Facility (replaced) | 266333 | Confidential |
| 9/15/25 | CHEERS Exhibit I2 Training Facility NorCal | 266383 | Confidential |

Source: CEC staff. These and other topical documents are filed on [docket log 25-BSTD-01](#).¹⁴

Staff reviewed all filings to identify that they met application and program requirements. Staff also met and corresponded with CHEERS often to understand how the exhibits would be applied to ECC Program administration.

(2) 2025 Data Registry Application

Data registry applicants must follow application requirements from Title 24, Part 1, section 10-109(b), and summarized in Joint Reference Appendix JA7.8. Combined application requirements include submission of:

- A description of the functional or analytical capabilities of the data registry or related data input software.
 1. A demonstration that the criteria in Section 10-109 are met.
 2. Reference Joint Appendix JA7.8 expands on these requirements needed for data registry approval, including a reference to Sections 10-109 and 10-110 (for process). The application should include a certification statement (per JA7.8.2.1) and evidence that the residential data registry conforms to the requirements specified in Reference Joint Appendix JA7.8.3.1, as quoted:
 - a. Capability to produce and manage registered documents. (JA7.5)
 - b. Electronic signature capability and manage authorization of users. (JA7.6.3.2.1)
 - c. Document data validation. (JA7.6.3.2.2)
 - d. Signer review and signature actions. (JA7.6.3.2.3)
 - e. Digital signature and digital certificate actions. (JA7.6.3.2.4)
 - f. Capability to transmit secured documents and data to the CEC Compliance Document Repository. [Not applicable.]
 - g. Document retention capability. (JA7.6.3.2.6)
- Capability to receive and process electronic data using best practices for secure data exchange, using data sources and procedures approved by the CEC for registering compliance documents. (JA7.6.3.2.7; JA7.7)

14 Available at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=25-BSTD-01>

- h. Capability for data exchange with the compliance report generation services made available by the CEC to generate formatted electronic documents. (JA7.2, JA7.7)
- 3. A data registry user manual. (JA7.8.5)
- 4. Compliance document registration self-test results. (JA7.8.2.2)

CHEERS filed the following exhibits to meet these requirements:

Table A-3: CHEERS Data Registry Application Submissions

| Date Submitted | Document Title | TN | Visibility |
|----------------|-----------------------------------|--------|--------------|
| 8/13/25 | Ex J - Data Registry Application | 265979 | Confidential |
| 9/8/25 | CHEERS Exhibit K | 266332 | Confidential |
| 9/18/25 | Exhibit L CHEERS EDDS Application | 266385 | Confidential |

Source: CEC staff. These and other topical documents are filed on [docket log 25-BSTD-01](#).¹⁵

Staff reviewed all filings to identify that they met application and program requirements. Staff also met and corresponded with CHEERS often to understand how the exhibits would be applied to ECC Program administration.

ADDITIONAL DISCUSSION

CEC’s Efficiency Division staff has discussed the sunseting of the HERS Program and entry of the ECC-Program since 2024. Key questions and answers appear on the [ECC Program webpage](#). A staff report discusses [ECC-Provider application guidance](#), from preparation through approval. Some discussions and additional points follow.

Program succession

CHEERS, as an ECC-provider, may continue its certification as a HERS provider within its December 2022 approval scope. However, all provider duties and responsibilities will be held to the requirements of the ECC Program regulations.

CHEERS-certified raters will be designated as ECC-Raters. However, designated ECC-Raters are not certified for the 2025 Energy Code unless they complete the 2025 certification requirements.

An ECC-Rater's quality assurance standing in the HERS program will convert to an equivalent standing under the ECC Program.

"Exemplary ECC-Rater" status may rely on a QA record that began under the HERS Program regulations. Although the provider sets the exemplary status, criteria are specified in Title 24, Part 1, section 10-103.3(d)5B.

The data registry for past code cycles will not be deactivated until all active projects under past cycles have been completed. Per JA7.8.4, “the Data Registry shall remain approved to provide document registration for projects that have been permitted under the prior versions of the Standards.”



15 Available at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=25-BSTD-01>

Past-cycle registered compliance document certificates will continue to reference the HERS Program.

The 2025 Energy Code's administrative regulations will take precedence if there is a conflict between applied and current regulations.

Impact of approval on parties other than CHEERS

CHEERS must maintain independence from entities that use the data registry to demonstrate compliance with the Energy Code.

Authorized users of the CHEERS registry are subject to qualifications and responsibilities outlined in the Energy Code regulations, including:

- Title 24, Part 1, Section 10-103(a) Documentation
- Title 24, Reference Appendices, Joint Appendix JA7.4 and Residential Appendix RA2
 - JA7.4 [Data Registry] Authorized Users
 - RA2.2 Measures that Require Field Verification and Diagnostic Testing
 - RA2.3 Documentation and Communication Requirements
 - RA2.4 Summary of Responsibilities
 - RA2.4.1 Builder
 - RA2.4.2 ECC-Provider and ECC-Rater
 - RA2.4.4 Enforcement Agency
 - RA2.5 Installer Requirements
 - RA2.6 ECC-Rater Procedures – Verification, Testing, and Sampling
 - RA2.8 Installer Requirements and Procedures for Alterations

Companies that employ ECC-Raters as personnel must obtain ECC-Rater Company certification to participate in projects within the CHEERS registry. One or more company principals must be certified, with at least one also certified as a 2025 ECC-Rater, to complete the training course and sign a Rater Company Certification Agreement.

CONCLUSION

CEC staff has determined that all application and administrative requirements are met by the CHEERS applications. Staff submitted to the CEC's executive director that the applications were complete, and considered any comments received during the public comment period, as specified in the Notice of Complete Application.¹⁶

CEC staff submits this evaluation to support the executive director's recommendation to the California Energy Commission.

16 TN 266157, available at

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=266157&DocumentContentId=103180>