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California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Post-Approval Amendment to CHEERS ECC Provider Application, Addition of Southern California Training Facility, Request for Nonsubstantive Determination

To Whom It May Concern,

CHEERS submits this cover letter in connection with its Post-Approval Amendment to its approved ECC Provider application pursuant to Section 10-103.3(c)7 of the California Code of Regulations. The amendment notifies the Executive Director of the addition of a third ECC training facility located at 11931 Los Nietos Road, Santa Fe Springs, CA 90670 (the "CHEERS Santa Fe Springs ECC Training Facility").

CHEERS respectfully requests that the Executive Director determine this amendment to be nonsubstantive pursuant to Section 10-103.3(c)7C. The full amendment application, including the facility write-up and supporting materials, is submitted concurrently herewith as a confidential filing. This cover letter is intended to serve as the non-confidential summary of that filing for purposes of the public docket.

Purpose of This Amendment

This amendment reflects two changes to CHEERS' approved ECC Provider application. First, it notifies the Executive Director of the addition of a third ECC training facility in Southern California. Second, it updates the Designated Contact from Shelby Gatlin to David Choo, Director of Compliance. The contact information update is a nonsubstantive modification expressly contemplated by Section 10-103.3(c)7C, which explicitly identifies modifying contact information as a nonsubstantive change.

Neither change alters CHEERS' training curriculum, certification procedures, quality assurance program, data registry operations, or any other element of its approved ECC Provider application. The addition of a third training facility location in Southern California is a matter of geographic accessibility, not scope expansion.

Regulatory Standard

Section 10-103.3(c)7C defines a nonsubstantive amendment as any change that does not impact consumers, ECC Raters, ECC Rater Companies, or alter the ability of the ECC Provider to comply with any requirement of Section 10-103.3(c)1. Section 10-103.3(c)7B defines a substantive

amendment as one involving changes to training, certification, or oversight that would result in such an impact.

The operative question is whether the addition of the Santa Fe Springs facility results in any adverse impact to consumers, ECC Raters, or ECC Rater Companies, or alters CHEERS' ability to comply with Section 10-103.3(c)1. For the reasons set forth below, it does not.

Justification for Nonsubstantive Determination

No Change to Training Content, Curriculum, or Certification Standards. The CHEERS Santa Fe Springs ECC Training Facility delivers the identical training curriculum, practical exercises, and performance rubrics used at CHEERS' two currently approved facilities in Sacramento and Watsonville. The training program covers all required 2025 FV&DT procedures, including but not limited to Building Air Leakage, Duct Leakage, Airflow and Fan Efficacy, Refrigerant Charge, Quality Insulation Installation (QII), Building Ventilation, plumbing verification, and more. No new training methods, no new certification pathways, and no modifications to performance standards have been introduced. Adding a third location at which the same approved training is delivered does not constitute a change to training or certification within the meaning of Section 10-103.3(c)7B.

No Change to Quality Assurance or Oversight Structure. CHEERS operates a single, fully centralized quality assurance and oversight program that governs all ECC Raters and ECC Rater Companies uniformly. Audit procedures, complaint handling, data registry oversight, and ECC Rater compliance monitoring are administered centrally by CHEERS regardless of which facility a Rater trains at. The addition of the Santa Fe Springs facility does not create a new oversight structure, does not introduce new oversight personnel with different authorities, and does not modify any existing QA protocol. The Executive Director's ability to oversee CHEERS' compliance with Section 10-103.3(c)1 is entirely unchanged.

No Change to Instructor Qualifications or Standards. All CHEERS instructors, whether traveling between facilities or assigned to a specific location, are subject to identical qualification requirements, training standards, and vetting processes administered directly by the CHEERS Director of Training. The vetting process requires each instructor to receive direct instruction from the Training Director, complete a structured shadowing period, and demonstrate competency before being authorized to instruct independently. This standardized process applies uniformly across all three facilities. No new instructor standards or qualifications are being introduced by this amendment.

The Facility Enhances Operational Consistency. Unlike the Sacramento and Watsonville facilities, which are housed within spaces leased from third-party organizations, the Santa Fe Springs facility is purpose-built and fully funded by CHEERS within a dedicated leased warehouse space.

CHEERS maintains exclusive scheduling and operational control over the facility, meaning there are no third-party scheduling conflicts, no shared-space complications, and no dependency on a host organization's operational decisions. From an oversight and consistency standpoint, CHEERS has greater direct control over the Santa Fe Springs facility than over either of its previously approved locations. This further supports a finding that the addition of this facility does not diminish CHEERS' ability to comply with Section 10-103.3(c)1.

The Amendment Addresses Geographic Accessibility, Not Scope Expansion. The primary function of the CHEERS Santa Fe Springs ECC Training Facility is to train and certify new ECC Rater candidates in Southern California. The geographic data below is presented not to suggest that the facility exists solely to serve existing Raters, but to demonstrate that Southern California represents the highest concentration of demand for ECC Rater training and certification in the state, and that no locally accessible CEC-approved training facility currently exists to meet that demand.

Approximately 61 percent of CHEERS' active California Raters are based in Southern California, spanning communities from Los Angeles and Burbank to Temecula, San Diego, Simi Valley, and Glendale, among others. This concentration reflects the scale of residential construction activity and consumer demand for ECC-certified Raters throughout the region. The existing density of active Raters in Southern California is a direct indicator of the volume of new Rater candidates that the region will continue to generate as construction activity under the 2025 Building Energy Efficiency Standards grows.

Currently, candidates seeking ECC Rater certification in Southern California must travel approximately 350 miles to the Watsonville facility or approximately 400 miles to the Sacramento facility to complete their required hands-on training. This geographic barrier discourages prospective Rater candidates from pursuing certification, limits the growth of the Southern California Rater workforce, and ultimately reduces the availability of certified Raters for the consumers and builders who depend on them.

The addition of the Santa Fe Springs facility removes this barrier by bringing CEC-approved training directly to the region with the greatest need. It does so without altering the training curriculum, certification standards, oversight structure, or any other element of CHEERS' approved ECC Provider application. This is an expansion of access, not an expansion of scope, and it is precisely the kind of change that is nonsubstantive in nature.

The regulation defines substantive changes as those resulting in an "impact" to consumers, Raters, or Rater Companies. CHEERS respectfully submits that the term "impact" as used in Section 10-103.3(c)7B is most reasonably read to mean an adverse or material impact on the quality, integrity, or accessibility of the ECC program. Adding a third training location that mirrors

approved facilities in all material respects and improves geographic accessibility for the majority of CHEERS' active Rater population does not meet this standard.

Conclusion

The addition of the CHEERS Santa Fe Springs ECC Training Facility reflects CHEERS' ongoing commitment to serving the ECC program, the Rater community, and California consumers. It does not alter training content, certification standards, oversight procedures, or any other material element of CHEERS' approved ECC Provider application. It expands geographic access to an already-approved program for Southern California Raters and the consumers they serve.

For all of the reasons set forth above, CHEERS respectfully requests that the Executive Director determine this amendment to be nonsubstantive pursuant to Section 10-103.3(c)7C and approve the amendment accordingly.

We welcome the opportunity to discuss this filing further and look forward to hosting CEC staff at the Santa Fe Springs facility for a site visit at your earliest convenience.

Respectfully submitted,



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