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CHEERS Comment 25-BSTD-03 Weigh-In Photographic Verification

Additional submitted attachment is included below.

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November 3, 2026

California Energy Commission
Docket Unit, MS-4
Docket No. 25-BSTD-03
715 P Street
Sacramento, California 95814

Re: Comments on Pre-Rulemaking Draft Regulatory Text for the 2028 Reference Appendices (TN 273089) RA3.2.3.1.6.2 and RA3.2.3.2.2: Photographic On-site Verification of Weigh-In Charging

Dear Commissioners and Staff:

California Home Energy Efficiency Rating Services (CHEERS), as an approved ECC-Provider, supports the Commission's inclusion of the Photographic On-site Verification option for the weigh-in charging procedure at RA3.2.3.1.6.2 and RA3.2.3.2.2, and supports its adoption with one conforming edit.

The option documents a procedure the HVAC installer already performs under RA3.2.3.1.5 and the ECC-Rater already verifies under RA3.2.3.2. It does not change the procedure or installer obligations.

The principal difficulty with weigh-in verification today is coordination. Live observation requires the HVAC installer and the ECC-Rater to be on site together during evacuation and charging, which is difficult to schedule and adds cost for the homeowner, the installer, and the ECC-Rater.

The draft option resolves this while preserving verification integrity, including:

- Geotagged, timestamped photographs identifying the project site, registered under RA3.2.3.1.6.2.
- ECC-Rater confirmation that the photographs are registered, consistent with the Certificate of Installation, geotagged, timestamped, and identifiable to the project site under RA3.2.3.2.2(a) and (b).
- ECC-Rater on-site verification of the outdoor unit model and serial number, the line set length, and the manufacturer charge calculations under RA3.2.3.2.2(c) through (e).
- Retest by live on-site verification under RA3.2.3.2.1 when the photographs or the on-site verification do not meet the requirements of RA3.2.3.2.2.

RA3.2.3.1.6.2(e) requires the HVAC Installer to upload the photographs. Under Section 100.5.1.2 Items 1 and 3 [Section 10-103(a)3A and 3C], Certificate of Installation documentation may be submitted by an Authorized Representative under a written agreement retained by the ECC-Provider, with legal responsibility remaining with the Responsible Person. CHEERS recommends conforming item (e) to that existing provision:

> (e) HVAC Installer, or their Authorized Representative, shall upload all photographs to the data registry.

CHEERS appreciates the Commission's consideration of this comment.

Respectfully,

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