

**DOCKETED**

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**From:** [Vicki](#)  
**To:** [Energy - Docket Optical System](#)  
**Cc:** [Juanita Garcia](#); [Vicki Burlingham](#)  
**Subject:** 19-HER-01 04/06/20 CEC response  
**Date:** Thursday, April 16, 2020 7:11:53 PM

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Good day,

We are a HERS rating company in the northern California area and have been using the CHEERS/California Energy Registry for over 2 years. We also used the CHEERS registry from 2005 until 2013. The registry is user friendly, even for the most basic of computer users. It rarely has downtime or error issues and the staff are great to work with. But I'm concerned about a letter from the CEC to the registry on 04/06/20 requesting the California Energy Registry stop using their name and cease business as a HERS registry. The reason for this notice to "CalEnergy" was their updated company name is similar to that of the CEC, California Energy Commission name. The "CEC" noted their could be confusion and that persons would associate the name with the "CEC" and their organization. Most people I speak with, including myself, use the acronym "CEC" for the energy commission so I don't see any confusion there. Even as a HERS rater, I don't see how I could confuse the two entities.

Other companies in the state, including the Sacramento area where the "CEC" headquarters are, also have a similar name to that of the California Energy Commission. Just because these companies have similar names to the CEC, I surely do not assume they are affiliated.

Here are but a few:  
California Energy Consultant Service  
California Energy Institute Inc  
California Energy Research  
California Energy Efficient Provider  
California Energy Alliance  
California Energy Star

These companies also fall under the Secretary of State, SOS rules for using a state as part of their company name. But, the SOS has allowed them to legally use it and given them entity numbers. As well, the SOS authorized California Energy Registry to use the name and they have an entity number as well. This would seem to negate the paragraph in your letter concerning the SOS rules for using the state name and it's possible affiliation with a government entity. Many companies use similar names and unless there is a copyright on that name or the SOS denies the request, we do not have much say about it. Another HERS rater opened a business in our area and is using a name similar to ours by only adding the number "1".

We appreciate there is, again, multiple choices in HERS registries and this helps our

customers receive documents in a timely manner. I ask that the CEC review this request again and allow the updated company name. No matter what name, we are in full support of the registry and look forward to many years of working together.

Thank you for your time,  
Vicki

*Vicki Burlingham*

*Owner/General Manager*

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