

| DOCKETED | |
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| Docket Number: | 22-BSTD-03 |
| Project Title: | 2022 Field Verification and Diagnostic Testing OIR Proceeding |
| TN #: | 246633 |
| Document Title: | Energineers Comments - Extend Comment Period |
| Description: | N/A |
| Filer: | System |
| Organization: | Energineers |
| Submitter Role: | Public |
| Submission Date: | 10/18/2022 4:32:24 PM |
| Docketed Date: | 10/18/2022 |

*Comment Received From: Energineers
Submitted On: 10/18/2022
Docket Number: 22-BSTD-03*

Extend Comment Period

Additional submitted attachment is included below.

From: [Mickey Souza](#)
To: [Energy - Docket Optical System](#)
Subject: 22-BSTD-03 – Extend comment period
Date: Tuesday, October 18, 2022 4:07:19 PM

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Dear CEC Staff,

The Commission released a Draft Staff Report on the 2022 Update of the Field Verification and Diagnostic Testing Requirements on October 14, 2022. The report incorporates the prior rule making that was commenced by the Commission almost a decade ago, contains more than 100 pages of text, and has numerous supporting documents and reports. The comment period for the report closes on December 2, 2022. The comment period must be extended if the Commission wishes to receive meaningful feedback.

Given that the HERS Providers, Raters, Rating Companies, Builders, Installers, and Trades are in the middle of adopting the Building Energy Efficiency Standards for the 2022 Code Cycle, which must be launched by January 1, 2023, key stakeholders are unable to digest, evaluate and properly comment on the Draft Staff Report given the short timeline provided by the Commission. The comment period should be extended to at least March 17, 2023, so that equitable participation can be provided by stakeholders encumbered by the 2022 Code workload. Please amend the notice and extend the comment period.

Some of my concerns that I would like to air are that I am seeing some poorly done HERS ratings, and homeowners are calling me to come test the home because their bill is high, or they are uncomfortable in their new Title 24 home. I have run into missing insulation (using infrared as the cathedral ceilings are closed up which makes it near impossible to fix, or leaky ducts or other issues.) I have followed other raters and found that their duct leakage numbers differ from ones that I have checked. Of course, this has nothing to do with CHEERS or CalCERTs, but more with the quality of HERS ratings.

On that note, I frequently get calls from contractors who have found out that they need a QII or even just an attic or wall insulation certification and things are already buttoned up. At this point, I refuse because I cannot "see" the insulation to measure it. Is there another way that can be adopted in these circumstances such as using infrared techniques to determine the R-Values? Is it possible that we use techniques such as; infrared, outside vs. inside temperature, shading, and time? Walls may be possible, but not attics?

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Kind Regards,
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