

<b>DOCKETED</b>	
<b>Docket Number:</b>	22-BSTD-03
<b>Project Title:</b>	2022 Field Verification and Diagnostic Testing OIR Proceeding
<b>TN #:</b>	246655
<b>Document Title:</b>	Mark Orloff Comments - Please Extend Comment Period
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*Comment Received From: Mark Orloff  
Submitted On: 10/19/2022  
Docket Number: 22-BSTD-03*

**Please Extend Comment Period**

*Additional submitted attachment is included below.*

**From:** [Mark Orloff](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 22-BSTD-03 – Extend comment period  
**Date:** Wednesday, October 19, 2022 8:37:26 AM

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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.

Sincerely,

Mark Orloff

