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Too much , Too soon

Commencing a rulemaking at this time prevents stakeholders from actively participating.

The Commission has released hundreds of pages of reports to review for the proposed rulemaking. The content covers over a decade's worth of regulatory history. With deadlines of early December to comment on these reports, there is not sufficient time to provide meaningful feedback.

The Commission has released this information during the busiest time for HERS Program stakeholders. The rollout of the 2022 Code is supposed to be released on January 1, 2023; industry stakeholders need this time to train for the new code cycle.

This is simply too much information to meaningfully understand and respond to in a very short period. A reasonable delay is appropriate.