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Comments from a HERS Rater Company

I have comments regarding a variety of subjects that we discussed today. I'm the manager of a HERS Rating company. We are based out of Santa Barbara and serve multiple counties that are within our ability to physically inspect. Here are my comments:

1) The reason it's better to have the contractor choose the installer is that they will choose a reputable company. They do this day in and day out and they understand the process. I've had countless arguments with homeowners who want to tell us what they think is and isn't required as far as filling out the forms. The homeowner will ALWAYS opt to try and get around CF2R and CF3R, to try and shortcut the process, and to choose the cheapest company regardless of quality. They'll be more likely to hire out-of-the-area raters, for example from LA, who are clearly not of quality. They might hire a rater who's not even within driving distance and don't even care about getting on-site. I see what you're trying to do but it will have the opposite effect. Neither the installer nor the homeowner wants to be the one doing the testing OR filling out the paperwork. Maybe you require the homeowner to sign off on the forms and to make the payments, but they do not want to have any involvement past that. I can promise you that. In the least, duct leakage testing, airflow, and Qll are the two forms that roll over to the 2R and 3R. I think it's essential that these forms be completed by a trained professional, not a homeowner or installer.

2) I do not agree that having the HERS Rater or HERS Rating company is a conflict of interest. The HERS Rater wants to enforce codes and is the one who is involved on-site. Having the HERS Rater make the reports lessens the amount of title 24 corrections that are needed or correction complications. We are the ones with the most motivation to have the project plans and title 24 reports be accurate. We are the ones with the most motivation to have the homeowner/contractor pull a permit in the first place. Furthermore, in the IECC states, you cannot license the software to do a model if you are not a HERS rater under a provider.

3) We love the term HERS. Please do not change the language that's already been here from the start, this will only create more CONFUSION. This is the language everyone has finally gotten accustomed to, which has gotten engrained in our advertising, on our website, and in all our educational materials. This will be detrimental.

4) I think the daily limit should be placed per project, not placed per "test". Test is actually a quite general term. One project might have multiple systems and it's possible to do multiple projects in one day. Especially when you consider multifamily projects where all the units are right next to one another takes a lot less time to complete. In other words, it would make more sense to limit the number of projects a

rater can complete in one day. Some projects have dozens of units on one project in ClaCERTS/CHEERS.