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## **Solutions to Proposed Issues**

We've been HERS Raters since 2010. Yesterday, we spoke about a lot of the issues we saw with the proposed changes so I wanted to follow up with some ideas for solutions. Firstly, I think it's important to make a distinction between the companies that are violating and those that are not. Most HERS Raters, we believe, are trying to do the right thing to the best of their ability. There are certain criteria that seem to be a common theme among the perpetrators. That's what should be the focus, who are the perpetrators, and what are the circumstances in which they are taking advantage?

1) Out-of-town Raters. As a small company in a small town, it is clear to us that clients will choose out-of-town raters just so that they can get cheaper rates. Often, it seems these companies don't deliver as promised or they sign off on projects while they live so far away that they never planned on coming on-site. A great way you can limit falsified information is to limit the service area of HERS Rating companies. Maybe the solution is a 100-mile radius, or maybe it's a limit on how many counties one rater can serve. I do know that when you go to the CalCERTS homepage and click on "locate a HERS Rater" the issue will be obvious to you. Take for example, when you search for a Rater in Santa Barbara county. There are pages and pages of results coming up offering Raters from LA, Sacramento, and all over the place. You can find BarrierEnergy, one of the only companies actually located in SB, on the second page of the results. As it stands, all a company has to do is note on its profile that they serve a certain area in order to come up in the search results. There are no limitations on how many areas or how far away the areas are, and that is a dangerous thing. That allows Raters from anywhere to claim that they are servicing as much as the entire state if they wanted to. They can sit at their computer and sign off forms all day long if they want to, while never actually setting foot on site. Our policy is to ALWAYS verify compliance with our own eyes. We take pictures of our test results and we keep a record showing that we were present. Maybe that's another idea, to implement photo uploads onto CHEERS/CalCERTS registries.

2) Greedy companies, who are typically part of large cookie-cutter corporations. We are a small family-owned business, and we pride ourselves on good customer relationships. The problem is, when a company gets to be a certain size the routine becomes robotic. The person on top sees the numbers of the profit and typically delegates the work until eventually, they are no longer even part of the process. Of course, you cannot limit the size of corporations, but you can get rid of sampling which has allowed many of these companies to give one test result and fake the rest of it. You could also limit the number of projects a Rater can complete in one day. The speed of completion largely depends on how many systems are in one place and how many units are in one place. The less

traveling is required, the less time it will take. Maybe you can go with a tiered approach based on the type of project rather than "one size fits all".

3) Fly-by-night consultants. I don't think the issue is so much that there's a conflict of interest regarding CF1Rs, but that there doesn't seem to be a clear course for certification to become a Title 24 consultant. As it stands, a Title 24 consultant MUST be a HERS Rater, but there isn't much else in the way of training and certification in this role. Another positive to having the title 24 consultant be in the same company as the Rater is that it allows them to get on site early. You can be assured that the Rater is aware of the project and is coordinating with the designer and owner. Ultimately, that achieves your goal.

Relationships between the Rater and contractors are vital to getting onto a job site early. There is really no way to educate every single homeowner because the only real way to learn about the process is to go through it. Most homeowners have no idea about the requirements until they reach final and the inspector tells them they cannot pass final without it. In our experience, that is the occurrence when homeowners reach out to us. At that point, all we can do is damage control because we have no real way of verifying what was done in construction except through word of mouth. If what you want is more compliance and accuracy, it's not the relationship between Raters and contractors that is the issue. We are happy to involve and educate the homeowner more in the process in any way we can, which we do. We are happy to go through more quality assurance measures. I think those are the measures that should be the focus of the solution rather than a perceived "conflict of interest". We've found that once we work with a contractor they are more prepared by the next time they call us AND they prepare the homeowner as well. They call us out earlier because they understand that there are ramifications with waiting till the last minute. They're the only ones who can help us inform the homeowner of what is to come.