

**DOCKETED**

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## **Update of the Field Verification Diagnostic Resting Requirements**

*Additional submitted attachment is included below.*

**From:** [Jeff Burkard / California Energy Design](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 22-BSTD-03 Update of the Field Verification Diagnostic Resting Requirements  
**Date:** Tuesday, November 22, 2022 8:10:03 AM

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I have been providing Title-24 Energy Compliance, Res and Non-Res, since 1986. I have been a HERS rater since 2005 (first with CHEERS, then CalCerts). I am the owner and sole HERS rater.

I have experienced in new construction, as many who called in during the conference, that these large HERS companies have ruined the industry. When I have gone out and tested an HVAC system, QII, or HRV's, for a mechanical contractor (or insulator) that I haven't done work for before, they are amazed at my correction list. QII being passed with out insulated headers, HRV's needing credit for accessibility that are installed way back in an attic somewhere, failing airflow, etc..

When the idea was floated by Joe about having a separate CF2R inspector/author I stood up and cheered. I have been saying this since the beginning. My idea was to make it mandatory for each permit application to include a Cabec certified Energy Analyst be assigned to the project. Probably the Title-24 author would be best, but a CEA would work. He/She would be in charge of making sure every item being installed in the project meets the CF1R and he can fill out the CF2R's once he has inspected the install. If the CEA has the equipment, they can also perform the testing for the CF2R's that also require a HERS rater's CF3R, and coordinate the hiring and scheduling of the HERS rater. If he/she doesn't have the equipment, he/she can be present when the HERS rater does the actual CF3R testing.

I know it is an added cost to the builder, but the process currently is a failure.

For alterations involving only an HVAC change-out, again more oversight is needed to make sure they are being testing properly. The High Quantity process should be eliminated, and more QA needs to be done.

Like others who commented, I have lost a lot work as a HERS rater because others are not inspecting/testing properly.

Thanks for letting me vent. I hope you can fix this process as I see too many projects not meet Title-24.

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