

DOCKETED	
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Hello, I am writing for the reference of proposed changes by the CEC for the HERS Inspectors Docket number 22-BSTD-03. Several of these changes may put the small independent Rater out of business, which will create more conglomeration in the industry, increase costs to the Homeowner, and affect 1000s of families. I hope the deciding committee takes their time and due diligence in making their decisions with how these new compliance reviews will shape the industry and change lives and ultimately has the Homeowners best interests in mind.

My biggest concern is item #4 of having the homeowner order and pay for the 3rd party Inspections. I can see that the goal is for the Homeowner to have more clarity for the inspection and ensure a reduced conflict of interest by allowing the Homeowner to order their own inspector.

There are some problems with the proposed idea

1. Homeowners are not aware of the required 3rd party inspection. After spending \$1000s on a new system, the last thing they are going to want to do is spend a few hundred more for the inspection. This will decrease the number of inspections taking place, and potentially the quality of the Trade to perform the installation if they know they can get away with "cutting corners."
2. For the registry purposes who would the project be created under, the homeowner or the HVAC contractor? If the HVAC contractor, they are going to the Rater who pulls their permits. That HERS company will be contacting the Homeowner for inspection and the Homeowner will default to using that Rater since that company is already involved with the project. This ultimately doesn't result in the reduced conflict of interest and nothing is accomplished. If the Homeowner, they will be lost in the process and now there will be 100,000s of people all open their individual account on the Registry, to pull their permit, and order HERS inspections. You will be reliant on the HVAC contractor to inform the Homeowner that they need to do these steps, or what will happen is the Contractor will just go and install and never inform the Homeowner they are required to do this, which results will not accomplish what you are looking to accomplish. (People want to pay for the service of having others do their work, not for them doing their own work).
3. The Homeowner, if educated on the matter, will just ask the HVAC contractor of their preference for 3rd party inspection. This results in nothing different than what is happening today. What this behavior could also encourage is kickbacks to the Contractor for the referrals
4. If still moving forward with the Homeowner ordering and paying for the 3rd party Inspection, what is the CEC's plan for educating the public they will need to do this? How ever this question is answered it will lead to higher costs and more of a burden on the homeowner owner either by taxes for marketing, incentives to the HVAC contractor to inform the Homeowner to go and order the inspection, or local jurisdictions needing to hire people to go out and look for changes to enforce inspections.

Thoughts to kick around for reducing conflict of interest

1 . Require the HVAC contractor to state who the 3rd party inspector is going to be to the homeowner on their bids. The homeowner can do their research or look up the 3rd party Inspector to verify what others have said about them, Yelp, Google, etc comments and Ratings, Company violations reported to the CEC, etc. Then the Homeowner can discuss with their Contractor before agreeing to terms if they would like a different 3rd party inspector

2.The Quality of inspection is already being answered in the Quality Assurance piece. Homeowner enforcement of ordering and paying for the inspection will not increase the inspections from taking place. What will increase the need for more inspections to take place is requiring Contractors to provide the permit # and Registry project # to the CEC, and/ or supply house within 20days of purchasing the equipment or else be fined. This will also keep Contractors from hoarding supply in their shop and improving supply chain issues. I imagine there are several 100,000s of installs that do not get a 3rd party inspection every year.

3. With the increase of Quality Assurance to the inspections stated for review with the rest of the docket, created a transparency for the homeowner with the quality assurance results being shared publicly. The homeowner can go in and review and discuss with their Contractor regarding their 3rd party inspector. Results can be shared on the CEC, the Registries, Consumer Reports, etc.

Thank you
John Hutson

