

DOCKETED

Docket Number:	22-HERS-02
Project Title:	2022 Title 20 Home Energy Rating System (HERS) OIR Proceeding
TN #:	247957
Document Title:	Sierra Pacific Home & Comfort, Inc Comments - Changes for the 2025 code
Description:	N/A
Filer:	System
Organization:	Sierra Pacific Home & Comfort, Inc
Submitter Role:	Public
Submission Date:	12/6/2022 11:59:03 AM
Docketed Date:	12/6/2022

Comment Received From: Sierra Pacific Home & Comfort, Inc
Submitted On: 12/6/2022
Docket Number: 22-HERS-02

Changes for the 2025 code

The changes in the code under the Conflict of Interest category to make raters collect payment directly from homeowners will make the entire business model more costly and less efficient to complete. Having this increase complexity will cause the costs to increase and will force raters to pass those cost on to homeowners. It will also slow down compliance as contractors will not be able to close out permits with building departments while there is a delay of getting the HERS documentation from the homeowner. All to often homeowners are already hesitant about building permits and now putting them in a role to be an obstacle to completing the process will be problematic for contractors that are currently complying with the law and working in good faith to complete permits and HERS testing. Added costs will make this worse. Putting homeowners as the responsible party for completing will make it so that less HERS tests are completed.