

DOCKETED

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ELEM3NTS â€™ Proposed changes to title 24

Additional submitted attachment is included below.

ELEM3NTS

1st Actor: Contractor.

The contractors that are doing the right thing have to add extra costs to their job: Building permit cost + HERS test + Extra sealing cost in front or extra for the potential repair + HERS Retest.

In the meantime, they must compete with companies that are offering the same service at a less expensive price because they are cutting the above costs (+/- 5-20%) but also don't have any problem with poor delivery. If it is true that in California 90% of HVAC change out don't have a building permit it is evident that the bad actors are HVAC contractors and homeowners. Spending time judging and fixing the small number of bad actors that are acting inside the 10% who follow the process, could be just a loss of time. Basically, this process (raters, testing, etc.) will prerequisite who is trying to do the right thing.

- **The Building Permit is a must and the Building Permit process for HVAC & water heaters must be simplified! – It should not be so costly, and cities/counties should charge similar prices.**
- **Fine the Contractor that allows a job to happen with no permit.**

2nd Actor: Homeowner.

Homeowners have no knowledge or time to understand the simple DUCT TEST. They are not interested because they don't know. The most important question is "How much does it cost?". The rater is not supposed to educate the homeowners, but to perform the test and be sure that the work has been done well. Does the building inspector educate? Does the HVAC company educate? Does the refrigerator/dishwasher technician educate? Etc....

- **The homeowner cannot be part of the process (just rarely).**
- **Fine the Homeowner that allows a job to happen with no permit.**

3rd Actor: Rater

The bad rater must be punished (3,4 steps and then out) is indisputable. In our experience we saw homeowners as contractors being bad actors too don't ask for building permits. All parties involved should be penalized, Contractors, Homeowners, and Raters.

- **If the rater that doesn't show up or fails badly frequently must be removed.**
- **In a big rater company, after 3 raters have been expelled, the company must be out too.**

The rater is NOT a technician. It is a misleading definition as today the HVAC technician is the one who fixes the HVAC. The rater is an energy tester and/or energy inspector.

Raters are your strength, your "army" on field, and they need your support and sustain against everything in the field. The Rater job can't be so complicated having other jobs in the market with less responsibilities and pay better. The rater must be more important; for example, as the home inspector the energy inspector should become mandatory every time a house is sold, or an HVAC is supposed to be changed - before and after the work is performed.

Other Considerations:

- City inspectors need to have better knowledge of Rater's job
- Contractors should be required to attend some sort of class/workshop every year to learn about duct sizing/sealing/etc.
- CEC should do some sort of TV commercial with a link to a URL for HERS education for homeowners, just so homeowners can be aware of duct leakage issues.
- Sampling should be eliminated. Major construction/developer companies don't need any discount as they are selling homes at the same price, the new homeowners deserve a system that has been tested and passed.
- Asbestos and less than 40 feet exemptions should be eliminated. They should always be certified by a Rater; it must require a visit to the home to collect supporting evidence.

- Exemption due to previous HERS certification must also be eliminated after 2 or 3 years (during this time possible that homeowner, other contractors, or rodents have damaged or disconnected portions of the duct system)
- All pictures taken should be uploaded to Calcerts/CHEERS with the test results. A duct blaster attaches to the return and Manometer with result.
- Too tight Test will make all projects fail. Having a 10-15% goal with a good airflow at return will be an excellent goal for the existing homes. For new as it is not 5% or less than 25 cfm in the envelope would be excellent too. Pretending too much is known as failing results.

- If California really wants 6 million heat pumps by 2030:
 - need to be exempt from City/County Planning Code Requirements, but still comply with Building Code Requirements (just like solar)
 - heat pumps should be 3–5-foot setback all cities (for safety only, only 3 feet necessary for medics or firemen to access) AND simpler setback/noise ordinances.

Sincerely,
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Principal

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