

DOCKETED

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Comment Received From: Grizzly Testing
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**on Update of the Field Verification Diagnostic Resting
Requirements**

Additional submitted attachment is included below.

From: [GRIZZLY HERS TESTING](#)
To: [Energy - Docket Optical System](#)
Subject: 22-BSTD-03 Update of the Field Verification Diagnostic Resting Requirements
Date: Wednesday, January 11, 2023 12:40:13 PM

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Good evening, and I hope this email finds you well!

Overlooking at the proposed changes, I do have some concerns.

I don't know enough about the goal of title 20 becoming part of title 24, but it appears that it's a fairly simple field verification, but will this require any outside qualifications?

Changing our title from rater to technician.

By definition, we don't install, replace, service, or repair any of the equipment that we are working on. In fact, we are not allowed to. Calling us a technician will confuse our role in the process.

Raters can only be hired by the property owner.

With the aggressive approach and the drastic changes California has put forth, everybody involved is already frustrated with the process, especially homeowners. In my professional opinion, making this decision will drive people away from pulling permits. I'm guessing around 20% of my change-out projects are hired directly through the homeowner. A good portion of these clients is already frustrated with the process by the time I get there. The permitting was an issue, the scheduling with the contractor was an issue, and now they're scheduling with me. Pacifically regarding the project spec don't comply... I have been cussed out, I have been threatened with lawsuits, I am constantly asked why didn't the contractor take care of this, and the list goes on. I had a client who had to hire an additional company to come out and make the corrections so her system would comply. On top of August, I feel that the contractors are going to utilize this to push the homeowners away from pulling permits. This is not gonna help California, in my opinion, based on my experience!

Rating companies will be able to provide secondary services, like pulling permits and signing as document authors, but independent Raters will not.

In all honesty, what exactly is the difference other than having office staff? I don't see how this can make any difference or does any good!

Small businesses like mine will get hurt by big changes like this. we dont have the man power

Thank you, and I hope everyone has a great Christmas!