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*Comment Received From: Jeremy Senkevech  
Submitted On: 1/12/2023  
Docket Number: 22-BSTD-03*

## **Proposed Changes**

*Additional submitted attachment is included below.*

**From:** [GRIZZLY HERS TESTING](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** Proposed changes  
**Date:** Wednesday, January 11, 2023 10:24:27 PM

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Please excuse my first submittal, was not ready and did not check for errors!

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? If so, what was due to the small companies?

Changing our title from rater to technician.  
I don't see how this isn't considered any more confusing than calling us a special inspector.

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. Specifically regarding the project that don't comply... I have been cussed out, 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 all this, 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 to facilitate such a change! Please consider the negative impact you will have on the small companies which collectively, plays a large role in California.  
Thank you, and I hope everyone has a great year!

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Thanks for choosing Grizzly HERS Testing. I wanted to reach out to you personally and ask about your experience. As a small business, we are always looking for ways to improve as a business. Your feedback will help us improve to better serve clients like you!

[https://g.page/r/CWo-S92z\\_gZDEBM/review](https://g.page/r/CWo-S92z_gZDEBM/review)

JEREMY SENKEVECH

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