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Separation between verification and testing

I agree with the CEC for the need in better CF2R form verification methods. I don't believe that letting a rater company having a non-rater do the CF2R documentation will be separation enough for the process to work any better than it does now. This verification person should be assigned as part of the permit process, and be responsible throughout the building process for verifying exactly what is being proposed (so it matches the CF1R) and installed. This person can be in charge of, with the builders consent, hiring the HERS rater to complete the CF3R items (and CF2R items that require testing if the verifier does not do the testing also). One large problem with the current system is that the HERS rater is brought into the project way too late and expected to fill out all the CF2R forms. If a CEA (Certified Energy Analyst) or HERS rater (who is not doing the HERS testing) was to be assigned at the beginning of the project (at Permit application would be best) as the CF2R verifying person, CABEC, CalCerts, or CHEERS could set up the QA and training program to fill this position. I have been providing Title-24 Energy Compliance since 1986, and been a HERS rater since 2005. I am involved in projects at the beginning (T24), then called in at the end (HERS). In between there are many changes with no regard for the CF1R. Most times it is impossible to revise the CF1R at the end of the project to match what has already been installed.