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Testing could be observed by city inspector similar to other tests

As a professional engineer and a staff member at multiple public agencies during my career, I agree that reform is definitely needed since HERS as is currently designed becomes a barrier to energy efficiency improvement and to pulling a permit on an HVAC change out for several reasons, especially for disadvantaged and low income communities. First, the HERS design can add cost to a homeowner that compels spending money on testing and discourages spending money on actual energy efficiency. Second, the quality of HERS rater's work is often not reliable and making them independent testing is a substantial cost. AHJs do not allow a trade contractor to self-certify compliance with California's safety codes under Title 24 (i.e. CBC, CMC, CPC, CEC, etc.). Instead, city inspectors typically observe hydrostatic and pressure testing performed by a plumbing contractor or perform spot checks themselves in the case of GFI protection. The current approach of using self-certification is best practice only for products of manufacturers, not for trade work performed onsite like duct sealing. Like the testing under the safety codes, testing for compliance with the California Energy Code could be the same or similar approach. It would be more reliable and cheaper to have the contractors perform the visual inspection of duct seals and perform the pressure & flow testing (observed by a city inspector) rather than to force homeowners or their contractors to hire an independent HERS rater company. Thank you for the opportunity to comment.