

**DOCKETED**

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*Comment Received From: Debora Gloria  
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**on 2022 Energy Code**

*Additional submitted attachment is included below.*

**From:** [Debbie Gloria](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 21-BSTD-01 (2022 Energy Code)  
**Date:** Friday, January 27, 2023 2:49:37 PM

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Dear CEC Docket Unit -

I'm a California registered architect and also a HERS Rater. I am the currently architect for a single family project and am working with an energy analyst to upload and sign our CF1R to the registry through CalCERTS. However, because I am a HERS Rater, I have been prevented from being able to sign the CF1R. I will not be the HERS Rater for the project, and I do understand the concern for conflicts of interest.

From your Blueprint Newsletter, Issue 140 from Oct/Dec 2022, the "Compliance Document Signatures" article says, in regard to the CF1R responsible person signature, "the Business and Professions Code does not prevent HERS Raters from accepting this responsibility..." However, I have been barred from signing as the responsible person. Is there a way for people who are both an architect and HERS Rater to be able to sign the CF1R if they are not the HERS Rater for the project? There would be no conflict of interest in that case. Perhaps, can there be a declaration that the responsible person signing the CF1R will not be the HERS Rater for the project?

Thanks for considering this, and if there is a solution, I would appreciate hearing about it.  
Best,  
Debra Gloria