

**DOCKETED**

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# INSTITUTE OF HEATING AND AIR CONDITIONING INDUSTRIES, INC.



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# What do you think are the main issues with the current HERS program?

- The current program is broken, and revisions are overdue and welcome. Thank you!
- There is collusion between contractors and HERS raters.
- The current program does not differentiate between quality contractors and others.
- It is used on a small percentage of installs.
- The quality of some HERS raters is suspect.



# Thoughts on proposed changes to HERS regulations

- It makes sense to move HERS to title 24
- Improved Quality Assurance programs are good. But ultimately here they are focused on the checkers, not HVAC installations.
- Complicating the relationship between the customer, contractor and HERS Rater will drive usage lower.
- Conflict of interest rules are confusing and I doubt will increase the quality of HVAC systems.



# Alternatives to consider to increase Energy Code compliance

- The HERS process is now 25 years old. It's time to evolve.
- Real time system diagnostics and performance logging is the future.
- Qualifying Contractors can certify and commission HVAC systems with full transparency and documentation of real system performance.
- AHJ video certification of mechanical permits.
- Existing HERS can be used to support these new technologies.

