

DOCKETED

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Via CEC Docket 23-HERS-01

Mr. Drew Bohan
Executive Director
California Energy Commission
1516 Ninth Street, MS-39
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On February 10, 2023, the California Energy Commission (Commission) commenced a formal rulemaking to amend Title 20, sections 1670-1675 of the California Code of Regulations. The filing started the official rulemaking process to change Title 20 and included the Proposed Regulatory Language (TN#248707) Initial Statement of Reasons (TN# 248708), Final Staff Report (TN #248709); and an Economic Impact Statement (TN #24812). Collectively, this rulemaking proposes to change what is commonly referred to as the HERS Regulations.

CHEERS remains committed to supporting HERS Raters while ensuring compliance with Title-24. CHEERS has reviewed CalCERTS' docket submission: *TN248952_20230224T125225_22- HERS-01 CalCERTS Objections* which claims the Commission is not meeting their obligation of assessing the direct impacts of its proposed action on HERS Raters as required by California's Administrative Procedures Act (APA) (Gov. Code §§11346.3 and 11346.4.).

CHEERS request the Commission meets with both Providers to discuss the rulemaking and compliance with the APA.

Thank you for your consideration,

Kevin Kane
Chief Operating Officer