

DOCKETED

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*Comment Received From: California Energy Consultants
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on HERS

Additional submitted attachment is included below.

From: [Diane Vessels](#)
To: [Energy - Docket Optical System](#)
Subject: 23-HERS-01
Date: Thursday, March 16, 2023 2:28:50 PM

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Dear Ms. Lorraine White,

I am writing to response to the concerns listed below. I do not believe that the CEC should proceed without waiting for public comment from the stakeholder's process to be completed and having an approved HERS replacement program in place.

Waiting to remove the HERS program until an equal or better HERS Program can be implemented makes sense to me.

I've been a HERS Rater since 2009 and am concerned about the impact making this change before a new HERS program in approved will cause confusion for the building departments, the HERS Raters, and the consumers.

I believe the HERS Program is an important part of providing the homeowners, builders and the community with better more efficient and globally responsible homes and equipment. Please consider the impact removing the HERS Program before you can replace it will have on all of us in the industry and the public.

- The Commission's proposal is to remove HERS from Title-20 before it adopts a replacement program. There is no reason to do this.
- The Commission can easily wait to remove HERS from Title-20 so that it revokes the HERS program at the same time it adopts a new replacement program into Title-24.
- The Commission has not responded to CalCERTS as to why it is doing these two rulemakings out of order.
- To remove HERS from Title-20 first puts all stakeholders at a significant disadvantage in the rulemaking process.
- What happens if the Commission is unable to get a timely rulemaking complete by the 2025 Code Cycle?
- **The simple solution is for the Commission to do the two rulemakings together.** This way the process is fair and transparent and there is no risk our industry.
- If the Commission revokes HERS from Title-20 in this rulemaking any impacts will be for the 2025 code cycle.

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Thank you for your time and consideration.

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Everything is energy and that's all there is to it. Match the frequency of the reality you want and you cannot help but get that reality. It can be no other way. This is not Philosophy. This is Physics. Albert Einstein