

**DOCKETED**

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<b>Project Title:</b>	2023 Repeal of the Field Verification and Diagnostic Testing requirements in Title 20
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*Comment Received From: Enercal  
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**on HERS Rater**

*Additional submitted attachment is included below.*

**From:** [Ramon Rendon](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** 23-HERS-01 HERS Rater Comments  
**Date:** Tuesday, March 21, 2023 2:17:43 PM

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To whom it may concern,

The California Energy Commission must not revoke the HERS Program for Field Verification and Diagnostic Testing without first safeguarding the HERS Program for future code cycles. The Commission's attempt to revoke an entire industry without first identifying what new rules will be adopted in its place is reckless and unlawful. The proposed rules under 23-HERS-01 will put me and my company out of business and must not be adopted.

We still find disconnected ducts in new construction from insulation company installers climbing over ducts to blow the insulation in the attic. Our industry is needed now more than ever. We've tested houses that homeowners said they've never had cool air in large rooms and they thought that's just how the system works, then we find a 12" duct disconnected blowing in the attic. This was a 50 year old home and the homeowner had been living there for 20 years and it was the first time they ever got cooling in their living room. This happens all too often and would really be a disservice to future homes that need their disconnected ducts discovered.

Please do not end the program without having a new program already in its place.

Thank you,  
Ramon Rendon, CEA  
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