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*Comment Received From: CalCERTS, Inc - Roy Mittleider
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on HERS

Additional submitted attachment is included below.

From: [Roy Mittleider](#)
To: [Energy - Docket Optical System](#)
Subject: 23-HERS-01
Date: Monday, March 27, 2023 3:46:18 PM

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My name is Roy Mittleider with 25 years' experience as a Builder, HERS Sr. Instructor, and Director of Training for the HERS Program.

Thank you for the opportunity to Comment.

I have been building and delivering HERS Rater trainings for over 10 years.

I have been following the changes proposed for the Filed Verification and Diagnostic Testing program, as the Commission proposes to move the program into Title-24.

There are some very interesting proposals by the Commission, and I look forward to providing feedback and data. Some of the new proposals match the existing program built by CalCERTS; however, there are many new ideas and concepts in the draft regulations. Some of them make sense, some do not. The costs associated with the proposals, and the proposals that Raters repeatedly recertify, should be carefully explored, and costs quantified.

Because of this, I am asking the Commission to finalize the changes to the proposed Field Verification and Diagnostic Program, and adopt that program into Title-24, before revoking the HERS Program from Title-20.

Roy Mittleider
Director of Training

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