

DOCKETED

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Hers Raters

Additional submitted attachment is included below.

From: [Chris Johnson - Kern Energy Raters](#)
To: [Energy - Docket Optical System](#)
Subject: 23-HERS-01 HERS Rater Comments
Date: Monday, March 27, 2023 5:05:43 PM

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Homeowner Impact:

Revoking FT/DT will impact both new construction and existing homeowners. The testing we provide fixes issues with subpar installations that happen daily. If it were not for HERS Raters testing every home, homeowners would waste energy and money on leaking ducts, low refrigerant, low airflow, low insulation, high fan wattage, etc. Imagine an air conditioner that was installed before the 2005 code cycle will now be ready for replacement in most cases. That new air conditioner and duct system will never be tested and thus potentially leaking very badly for the next 20+ years. For a state that is on the energy conservation forefront, this change does not make any sense.

Business Impact:

I read in the initial report that there wouldn't be any business impact. This couldn't be any further from the truth. As you can now see from the many comments, there are many businesses and therefore even more families and individuals that are going to be impacted financially. It says in the docket that this change would be for making California more competitive business-wise. This change would make the HVAC & insulation installation landscape a wild west that it once was before. HERS Rating is the reason installations have gotten increasingly better throughout the years. It makes no sense to revoke FT/DT when it provides so many benefits and so few negatives.

Please reconsider postponing any decision to change the current codes.

Thank you.,

Chris Johnson
Owner
Kern Energy Raters