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Hers Rater

Additional submitted attachment is included below.

From: [Jeremiah Ellis](#)
To: [Energy - Docket Optical System](#)
Subject: 23-HERS-01 Energy Consultant and HERS Rater
Date: Monday, March 27, 2023 9:41:42 PM

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Hello, my name is Jeremiah Ellis. I have been working on this industry for 20 years, as an Energy consultant and HERS Raters.

Thank you for the Opportunity to Comment.

Over my career, I have been fortunate enough to build long standing relationships with a wide range of builders. From the personal home builder, the GC that builds a handful of homes a year, the regional builders who build a few hundred homes a year, to the large nation builders constructing thousands of homes a year. No matter their size, they ALL are very grateful for the 3rd Party consulting and service that HERS Raters provide. They have grown to trust the expertise in the energy standards that the HERS Rater industry has developed. The HERS Rater has become the first point of reference when staying on top of the code changes and the clarifications issues like those in the CEC blueprint. Along with the nuances of the code surrounding things like the blower door testing requirements in MF building when balanced ventilation is not used or when insulated headers got included as a part of Qii and full width headers were no longer enough. The 3rd party FV/DT has also proven to be of great value to these builders. Many of them use a variety of contractors for each scope, the HERS Rater keeps them in compliance, but also allows the builder to keep a score on the contractor. The builders rely on the HERS Rater to take on a training role to help educate the installers on the best practices that need to be followed for insulation, air sealing, hvac, and more. The HERS Rater gets brought in as a 3rd party during home owner comfort issues. The raters involvement in the lifecycle of home construction reaches far beyond just FV/DT.

Its undeniable that the work that the Commission is doing, evaluating the HERS Program, improving consumer protection, is important.

HERS Raters are on the front lines of substantiating and enforcing the Energy Code.

My simple request of the Commission is to work through all the proposed changes to the Field Verification and Diagnostic Program, and adopt that program into Title-24, before revoking the HERS Program from Title-20.

The HERS Raters and Rating firms need to be presented with resources that allow them to clearly understand how their work and businesses are being impacted by any changes before they can substantively comment on this rulemaking.

Jeremiah Ellis