

DOCKETED

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*Comment Received From: CalCERTS David Choo
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Hers Raters

Additional submitted attachment is included below.

From: [David Choo](#)
To: [Energy - Docket Optical System](#)
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Date: Tuesday, March 28, 2023 10:31:43 AM
Attachments: [image002.png](#)

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To the California Energy Commission:

My name is David Choo and I have been involved in energy code enforcement for over a dozen years. I currently serve as the Quality Assurance Manager at CalCERTS. Previously I was a HERS Rater, I was in Test and Balance, and have a C-20 Contractor's license.

When I started in this industry as a HERS Rater, it was because I had a deep belief that HERS Raters are the good guys. I've seen the industry from the perspective of an HVAC installer and the idea of HERS Raters made a lot of sense to me.

During my time as a HERS Rater, I was recruited by HERS Provider CalCERTS to conduct Quality Assurance field reviews of HERS Raters, and to expand our QA program. I've personally conducted more HERS Quality Assurance reviews than likely anyone in the State of California.

I have been involved and have communicated with the CEC regarding QA and what it entails. I've written clear instructions on what we've found works and doesn't work with regards to Quality Assurance. We've built a very robust Quality Assurance program.

I've been following the changes proposed for the Field Verification and Diagnostic Testing program, as the CEC proposes to move the program into Title 24.

There are some very interesting proposals by the Commission with respect to the QA Program and Title 24 rulemaking, and in response I've submitted comments to the docket and am happy to share any information, data and expertise I have. I hope the Commission would want subject matters experts involved in the rulemaking.

The Commission has to assess costs to the program, homeowners, energy costs, and all stakeholders. If one takes a step back, the CEC must consider the numbers of HERS Rating happening per year. Above that, there are supporting trades like energy consultants, HVAC design companies, support and administrative staff, that will be affected by the proposed regulations.

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. Not doing them together will diminish the voice of stakeholders and those impacted by the changes. I fully understand that the effective date of the parallel rulemakings is the same, however, by first passing the removal of the FV&DT program from Title 20, HERS Raters, Providers and all other stakeholders will have a diminished voice in the Title 24 rulemaking.

Best Regards,

David Choo

Director of Compliance



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