

**DOCKETED**

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<b>Project Title:</b>	2023 Repeal of the Field Verification and Diagnostic Testing requirements in Title 20
<b>TN #:</b>	249463
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*Comment Received From: Delta T Energy Consulting  
Submitted On: 3/28/2023  
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**Hers Raters**

*Additional submitted attachment is included below.*

**From:** [Adrian Osgood](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** Docket 23-HERS-01 - Adrian Osgood (Delta T Energy Consulting)  
**Date:** Tuesday, March 28, 2023 11:03:34 AM

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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. I have spent the last seven years building a company, now ten employees, with the understanding that HERS testing and diagnostics was an integral component of upholding the California Energy Code. In our years of experience we have found that without oversight the industry will naturally default to the wild west, negating any positive effect the CEC may have had on the industry. We constantly find installation contractors illegally dodging HERS requirements to the detriment of homeowners, property owners, and the State of California as a whole. Moving forwards without a clearly defined path for maintaining the HERS regiment will undo years of work towards energy management/sustainability in the State and would showcase the CEC's inability to uphold the core concepts of its existence. The proposed rules under 23-HERS-01 will put me and my company out of business and must not be adopted.

According to the HERS Rulemaking Presentation that I am attending today, the CEC is stating that the proposed changes will not eliminate the Field Verification and Diagnostic Testing from future energy code cycles. Please understand that numerous HERS rating companies throughout the state will be affected if the HERS program undergoes substantial changes and will prove costly to the lives and well being of many individuals.

Best,

-Adrian Osgood

CEA, HERS, ACCA, CALGreen

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