

**DOCKETED**

<b>Docket Number:</b>	22-BSTD-03
<b>Project Title:</b>	2022 Field Verification and Diagnostic Testing OIR Proceeding
<b>TN #:</b>	249852
<b>Document Title:</b>	Lanes Air Conditioning & Heating, Inc. Comments - § 10-103 (2022) Energy Code requirement
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Lanes Air Conditioning & Heating, Inc.
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*Comment Received From: Lanes Air Conditioning & Heating, Inc.*  
*Submitted On: 4/24/2023*  
*Docket Number: 22-BSTD-03*

**Â§ 10-103 (2022) Energy Code requirement**

*Additional submitted attachment is included below.*

**From:** [John Lane](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** § 10-103 (2022) Energy Code requirement  
**Date:** Thursday, April 20, 2023 10:02:00 AM

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§19-103 CF1R/LMCC: The responsible person signing the document must be the primary installing contractor, building owner or builder, certified energy analyst or architect, or engineer. HERS Raters are not intended to sign as a project's responsible person on the CF1R/LMCC. This is a reasonable requirement except for when a "installing contractor" is also certified as a HERS rater. (not the HERS rater on "his / her" project, but does FV & DT on "other" projects.) The system will NOT ALLOW the INSTALLING CONTRACT sign "HIS" document CF1R as a responsible party when in fact he / she "is" the responsible party. So now, the contractor who also is a "HERS rater" must seek a party who IS NOT the responsible party so sign the document **because of poorly written Code requirement**. Gentlemen, get your act together and write a quality code requirement meeting "all" of todays situations. Not just a "quick fix."

John Lane, CM  
LANES AIR CONDITIONING & HEATING, Inc.  
NCI Certified Residential Performance and Air Balance Technician  
Cal Certs Certified Home Rating Service Technician  
Certified Carrier Air Conditioning Specialist  
NATE Certified Heat Pump Specialist  
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