

DOCKETED	
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*Comment Received From: energuy
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FV&DT Comment - Energuy - June 2023

Additional submitted attachment is included below.



energuy

Title 24 Rulemaking

FV&DT COMMENTS

June 2023

NAME CHANGE PROPOSAL

Program Name Change: We accept the recommended name change ECC Rater and ECC Rater Company and will continue to use Rater/Rater Company as the industry adopts the new nomenclature.

HOMEOWNER VS. CONTRACTOR PAY

Agree with Contractor Pay.

We would Support a Homeowner pay system in the future with more infrastructure and education.

Suggestions:

- Title 24 and Permitting costs vary by city and Rater Company. Contractors may be subscribed to comprehensive service packages or basic; some including final inspection services which greatly benefit the consumer directly. With multiple permit trip fees, additional systems that need to be tested, or possible revisits - it's almost impossible to determine the costs at the time of contract. The market and competition will determine the price of installs.
- Ensure that all consumer rebates for hvac changeouts require a permit prior to rebates being paid to homeowners.

CERTIFICATE LIMIT PROPOSAL

Suggestion:

- Remove daily limit
- How do we police the 72 hour rule and what are the consequences?



RATER SHOPPING

We are in agreement with this rulemaking.

Suggestions/Questions: there is no regulation over a contractor, how is this proposed to be enforced?

VERIFIED RATER PROPOSAL

We agree that a Verified Rater should receive fewer QA's.

Suggestions:

- Add a minimum required number of jobs, in addition to the 5 year requirement. A high volume rater can complete the same volume of jobs in 1 year as a low volume rater completes in 5 years.
- eg: 5 jobs/week x 50 weeks x 5 years = 1,250 jobs
- eg: 25 jobs/week x 50 x 1 year = 1,250 jobs
- Our recommendation is 750 jobs + 5 years of experience

DETAILED TRAINING REQUIREMENTS

We agree with required training.

Suggestions:

- We suggest hands on training sessions. We recommend that the Providers
.....
open/provide access to training facilities.
.....
- Suggest the providers host sessions by manufacturers/distributors/Verified Rating
.....
Professionals bi-annually.
.....
- We also suggest the Providers participate in-field with contractors once per year.
- Is there a path for rating companies to get their own internal training certified?



PHOTOGRAPHIC EVIDENCE

We are in agreement with granting access to our photographic evidence to the Provider. Energuy has mandatory photo requirements for each rater.

REQUIRED PHOTOS



SOP T24 Pictures v01.03 011421

As professionals, Energy HERS Raters are expected to fully document their findings, both in reports and pictures. Ideally there would be picture to back up every data point you report. While this is not always possible, it is nonetheless the goal.

Some jobs are very simple and only a few pictures are required. An example of this is a new furnace only, with passing leakage numbers. In this case, only 5 pictures are required:

1. Wide angle picture of home from the street (with address – even better)
2. Wide angle picture of FAU (shows venting, return plenum & garage location)
3. Close up of FAU data plate
4. Picture of attic (or crawlspace) with ducting
5. Manometer with duct blaster in the background showing the correct ring. If the entire setup is in the background (a pictured below), even better. *But if not, a separate wide angle picture of the duct blaster setup is required.*



PANEL COMMENTS

Other issues and associated impacts:

HERS Programs demonstrate an increased level of quality of installs.

- Energuy sets a target of a 98% pass rate for each contractor. Revisits are reviewed monthly on site with the install crew and management. Installers are often incentivized by management to adhere to Title 24 regulations. We review photos of the reasons for failure, attend installs alongside techs in the field to help them understand the requirements. This often assists in developing collaborative relationships and a better understanding of Title 24 and the importance of efficient installations.
- We suggest HERS Raters provide some type of quality report to the contractor and provide access to the reports to the providers.



PANEL COMMENTS

Other issues and associated impacts:

The data used to design rulemaking was unsubstantial.

Recommendations:

- Reports should consist of data from contractors, building departments, CSLB, Rater Company Representatives, Raters and Providers. The data shall be verifiable and based on a significant data set.
- Allocate a research budget to obtain intelligent data from non-biased sources.



PANEL COMMENTS

Other issues and associated impacts:

Decertification of Raters across the industry.

Recommendations:

- Decertification and escalated corrective action policies should be shared between all providers.
- If one provider has decertified a Rater and the requirements for coaching, corrective action have been met. The rater should not be able to approach another provider for certification.
- We need more clarification and input into the Rater Company corrective action policies before added into the formal rulemaking.



PANEL COMMENTS

Other issues and associated impacts:

Decertification of Rater Companies across the industry.

Questions/Recommendations:

- We need more clarification and input into the Rater Company corrective action policies before added into the formal rulemaking.



PANEL COMMENTS

Other issues and associated impacts:

Cost of Rater Training, Oversight and Quality Assurance.

Comments:

- The cost of providing proper training, company culture, professional uniforms and vehicles, thorough onboarding, advancement, support, homeowner education and permitting/compliance solutions has significant costs to the rater company.
- We would like to see a path for rater companies to certify their internal training.

PANEL COMMENTS



Other issues and associated impacts:

The unavoidable association of HERS to the permit process in California:

- Although regulated by different entities, the HERS and Permit Process are inter-dependent. There is no efficient way to remove the HERS Companies from this process that will not expressly discourage compliance.
- A California Compliance Committee is suggested: Participation from a representative for stakeholders; Rater Companies, distributors, CSLB, Building Officials, Contractors, Providers, and CEC to streamline the permitting process based on the CF-1R requirements. Pick up the work of the WHPA.
- There is not a true single source for permitting requirements or inspection requirements.
- Streamlined permitting processes throughout the state will likely catapult compliance to 90%.
- A focus on alterations basic permitting process and electrification conversions.



PANEL COMMENTS

Other issues and associated impacts:

Disclosure of Results to Homeowners/Customers:

- Groundwork for reporting to consumers should be developed prior to the rulemaking requiring that HERS Raters show results of HERS testing to consumers.
- The goal for disclosure should be presented as a collaborative effort between the Rater, the contractor and CEC /Providers to ensure high quality installs and Title 24 standards.
- Homeowners should be made aware that 85%+ contractors do not pull permits and they should not allow unpermitted work in their home
- Homeowners should feel as though their contractor and the state have gone above the industry standard to service them properly.

**** Recommended report should be simplified CF-3R.

**Thank
you.**

energuy