

DOCKETED	
Docket Number:	22-BSTD-03
Project Title:	2022 Field Verification and Diagnostic Testing OIR Proceeding
TN #:	250732
Document Title:	Chris Ochoa Comments - CBIA Comments on HERS Proceeding
Description:	N/A
Filer:	System
Organization:	Chris Ochoa
Submitter Role:	Public
Submission Date:	6/25/2023 8:54:47 AM
Docketed Date:	6/26/2023

Comment Received From: Chris Ochoa
Submitted On: 6/25/2023
Docket Number: 22-BSTD-03

CBIA Comments on HERS Proceeding

Additional submitted attachment is included below.

June 23, 2023

Commissioner Andrew McAllister
California Energy Commission
715 P Street
Sacramento, California 95814

RE: Comments and Concerns:
Staff Report #2 – Title 24 HERS Program
Docket Number 22-BSTD-03

Commissioner McAllister

The California Building Industry Association (CBIA) is a statewide trade association representing over 3,000 member companies involved in residential and light commercial construction. CBIA member companies are responsible for over 85% of the new homes built in California each year.

Concerning the HERS program, we are concerned with what seems to be an unnecessary rush to get these regulations into formal rulemaking and approval. With a proposed effective date of January 2026, we suggest the Commission and its staff take more time to develop updated HERS proposals in collaboration with the industry. We know the Commission is committed to getting the best product for the state.

The latest staff report exceeds 40 pages and will likely incur significant new costs. In looking through the report, we have a few comments for your consideration:

New vs. Existing Home Inspections. The inspection process for existing and new homes is fundamentally different and should be addressed separately in the final regulations.

Limiting Collaboration Design. It is more effective and efficient to have raters who are trained in and knowledgeable of energy efficiency standards contribute to the design phase. Builders and contractors are the ones that make the final decisions on design, installation, and equipment, not the raters. We do not see a conflict and believe that collaboration at the front end of a project gets better results.

72-hour limit on registration of certificates. The staff recommendation seems arbitrary to us and should be revised.

Raters of Record. The staff report requires that the **same rater** be responsible for completing inspections, including after a failed test. We are concerned that this proposal will impact the timely completion of inspections and, in turn, slow down construction.

We support efforts to make homes more energy efficient through the HERS program. We urge the Commission to take the time it takes to make sure that the final Title 24 regulations facilitate more inspections without unnecessary costs.

Sincerely,

Chris Ochoa