

DOCKETED

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Via CEC Docket 22-BSTD-03

CalCERTS Comments on Quality Assurance Cost Assessments

CalCERTS has submitted numerous comments on the draft staff report addressing numerous issues. It is our understanding that the California Energy Commission is required to conduct cost analysis, especially when new costs are imposed on the industry.

In a previous submission, we commented briefly on CalCERTS historic cost of conducting a field QA. That cost did **not** include other supportive costs. We recommend the CEC include in their cost assessment of QA Reviews:

- **QA Review Cost:** This should include the cost of the qualified and experienced staffer to conduct a QA Review on a HERS FVDT Inspection. These should not be conducted by an inexperienced individual.
- **Scheduling Time and Communications Platform:** Scheduling a QA review requires a significant amount of time and effort, from training staff, to making calls, to communications cost incurred.
- **Mileage, Travel Time, Travel Expenses:** These are all dependent on QA location and availability.
- **QA Review Analysis:** Once a QA Field review is conducted, it must be processed and analyzed. This requires data entry along with supportive programming to store results in a database.
- **Provider to Rater & Rating Company Correspondence:** Upon completion of the Review and Analysis, preparation of correspondence through email is required. In addition, follow-up conversations are often required to discuss the QA results and any potential mitigating factors. These require experienced Subject Matter Experts collaborating with Rater and Rating Companies on how to be more effective in completing truthful and accurate FVDT Inspections.

- **Complaints:** Complaints are extremely time-consuming and therefore expensive. The cost associated with the management of a complaint by an experienced Subject Matter Expert should be assessed.
- **Reporting to California Energy Commission:** The cost for additional requirements of specific data should be assessed. In addition the CEC proposed that Provider to CEC reports be submitted quarterly. It is an increase in cost to submit these reports quarterly instead of annually.

We note that the California Energy Commission has not asked CalCERTS for any of these costs specifically; but have made general inquiries for cost information. CalCERTS is working to compile this specific information for further submission to the CEC in response to narratives on the proposed next draft of the report that were provided last week.

Sincerely,



David Choo
CalCERTS, Inc.
Director of Quality Assurance