

DOCKETED	
Docket Number:	23-HERS-02
Project Title:	Whole-House Home Energy Rating and Labeling Pre-Rulemaking
TN #:	253699
Document Title:	Request for Information on Home Energy Rating and Labeling
Description:	The California Energy Commission seeks information from the public and invites interested parties to submit comments as it considers updating the California Home Energy Rating System (HERS) Program regulations as they pertain to home energy rating and labeling services (also called the whole-house program).
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CEC-057 (Revised 1/21)



Request for Information (RFI)

California Home Energy Rating and Labeling

Docket 23-HERS-02

Written Comments Due: February 23, 2024

Purpose of Request

On October 19, 2023, the California Energy Commission (CEC) instituted a rulemaking proceeding under Public Resources Code § 25942 et seq. ([Home Energy Rating and Labeling Program](#)) to consider amendments to the California Home Energy Rating System (HERS) Program regulations¹ (Title 20, California Code of Regulations, §1670-1675). The CEC seeks information from the public and invites interested parties to submit comments as it considers updating the California HERS Program regulations as they pertain to home energy rating and labeling services (also called the whole-house program).

Background

Advancing energy efficiency of new and existing residential buildings is a critical strategy to achieving California's climate action and greenhouse gas reduction goals. This request for information pertains to Public Resources Code (PRC) § 25942, Home Energy and Labeling Program, which directs the CEC to establish a consistent, accurate, and uniform home energy rating system based on a single statewide rating scale for new and existing residential dwellings. The program is voluntary and intended to assist homeowners, homebuyers, renters, and others in understanding the energy performance of their homes. The program is directed to include reasonable estimates of potential utility bill savings and reliable recommendations on cost-effective measures to improve energy efficiency.

In response to this directive, the CEC created the California HERS Program in Title 20 of the California Code of Regulations, which includes two subprograms. The first is the voluntary whole-house program, as called for in PRC § 25942. The second subprogram is the mandatory field verification and diagnostic testing (FV&DT) program, which is being proposed for removal from Title 20 and relocation to Title 24 under a separate proceeding to allow the CEC to better implement, manage, and improve both programs independently.

The overall goal of the whole-house program is to provide consumers with reliable information regarding the relative energy efficiency of a new or existing home. This information can be supplemented by cost-effective energy efficiency recommendations which Californians can

¹ California Code of Regulations, Title 20. Public Utilities and Energy, [California Home Energy Rating System Program](#).

choose to implement to help them save energy and money on their energy bills. The California HERS Program as it pertains to home energy rating and labeling services has not been updated since 2009.

In this rulemaking proceeding, the CEC will consider various amendments to update and improve the voluntary whole-house program regulations to better support state energy efficiency, climate action, and greenhouse gas emission reduction goals. The CEC seeks information and feedback to learn about other programs and tools that assess and rate the energy efficiency assets of residential buildings and tools, how these programs and tools are applied to advance energy efficiency, and how information about cost-effective improvements can most impactfully be communicated to Californians via labels or other means.

Request for Information (RFI)

This RFI provides interested parties an opportunity to submit for consideration written technical information, data, reports, and comments on updating Title 20 regulations, Section 1670 – 1675, as it relates to California’s home energy rating and labeling services. The goal is to encourage public participation and gather preliminary information that will be used to kick-off the public workshops that will begin in early 2024.

Where feasible, comments should be as specific as possible and include examples and recommendations with supporting references. CEC staff will review written comments in-depth and may use the information provided to develop regulatory proposals for the whole-house program.

The following questions are examples for which CEC staff is seeking information related to the whole-house program.

- 1) What home energy rating and labeling services and programs currently exist?
 - a. Which existing programs are the most developed or have completed the largest number of ratings?
 - b. Which existing programs successfully promote consumer awareness and education on the monetary and or environmental benefits of energy efficiency?
 - c. Which existing programs promote energy-efficient construction practices?
 - d. Which existing programs increase compliance with building standards?
 - e. Which existing programs are recognized by appraising and lending communities and may result in higher real estate values?
- 2) What asset rating tools and software can be used to generate home energy ratings and labels?
 - a. What dwelling types can these tools assess – single family, low-rise multifamily, high-rise multifamily, mixed-use buildings?
 - b. Are these tools capable of assessing performance, assets (independent of performance), or both?
 - c. What inputs are required to generate home energy ratings?
 - d. What assumptions and/or boundaries are assumed by these tools?
 - e. What calculations or algorithms are used to generate the ratings?

- 3) What are the most important elements to creating a successful home energy rating and labeling program?
- 4) How specific and accurate do home energy ratings need to be?
- 5) What metrics/units are most important to include on home energy ratings (e.g. energy bill costs (\$), energy (kWh, Therm, BTU), energy use intensity (KBTU/ft²-year), greenhouse gas emissions (CO₂e)? Should these units be normalized by floor area?
- 6) What are known or possible barriers to providing reasonable estimates of potential utility bill savings, and reliable recommendations on cost-effective measures to improve the energy efficiency of homes? Are there examples of existing programs that have overcome these barriers?
- 7) There are many different rating scale systems that could be used (e.g., 1 through 10, 1 through 100, grades A, B, C, etc.). Should a scaling system be considered? If so, what scale and labeling system should California's home energy rating and labeling services learn from and why?
- 8) How can California's home energy rating and labeling services rate both newly constructed dwellings as well as additions and alterations to existing dwellings on the same rating scale?
- 9) How can the CEC encourage adoption and use of a voluntary home energy rating and labeling services?
- 10) How can the CEC ensure the benefits of home energy rating and labeling services are equitably distributed to California's low-income and disadvantaged communities?
- 11) Should California's home energy rating and labeling services provide a process for accepting other third-party rating systems to be recognized by the CEC? How could this be technically achieved considering programmatic differences?
- 12) What role(s) should field professionals or assessors have to support California's home energy rating and labeling services?
 - a. Is there a need to certify these individuals or entities? If so, what knowledge and skills do these professionals need to possess?
 - b. Who should certify these individuals and entities? Should these individuals and entities be regulated?
 - c. How can the CEC ensure there is an adequate and well-qualified workforce to provide statewide coverage of home energy rating and labeling services?
- 13) What level of quality assurance is warranted for voluntary home energy rating and labeling services in California?
- 14) What is an acceptable cost for completing home energy rating and labeling services in California?
- 15) What other valuable information should be included as part of California's home energy rating and labeling services?
- 16) What organizations or stakeholder groups should be made aware and invited to participate in the home energy rating and labeling proceeding?

Submitting Comments to the CEC Docket

Participation in the RFI is highly encouraged. Public input is essential to ensure a complete record for this rulemaking.

Written comments, proposals, and other technical material must be submitted to the Docket Unit by **February 23, 2024**. Written comments, attachments, and associated contact information (for example, address, telephone number, email address) will become part of the public record of this proceeding, with access available via any internet search engine. One or more public hearings and public input periods will follow on the proposed draft text of regulations.

The CEC encourages use of its electronic commenting system. Visit the [e-commenting page](https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=23-HERS-02), <https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=23-HERS-02>, which links to the comment page for this docket. Enter your contact information and a comment title describing the subject of your comment(s). Comments may be included in the “Comment Text” box or attached in a format consistent with CCR, Title 20, section 1208.1. The maximum file size is 10 MB.

Written materials may also be submitted by email. Include the docket number **23-HERS-02** and “Whole-House Home Energy Rating and Labeling Pre-Rulemaking” in the subject line and send to docket@energy.ca.gov.

If preferred, a paper copy may be submitted to:

California Energy Commission
Docket Unit
Re: Docket No. 23-HERS-02
715 P Street
Sacramento, CA 95814

If interested parties wish to maintain the confidentiality of specific data or information, they should submit an application for confidentiality and the confidential documents directly to the Docket Unit through the e-filing system. For information on applying for confidentiality, interested parties should contact the Docket Unit in the CEC’s Chief Counsel’s Office before submitting a response to this RFI. Otherwise, all responses received will become publicly available. Visit the [Docket Unit page](https://www.energy.ca.gov/about/divisions-and-offices/chief-counsels-office/docket-unit), <https://www.energy.ca.gov/about/divisions-and-offices/chief-counsels-office/docket-unit>, which links the application for confidentiality.

Questions regarding submitting comments to the docket, including inquiries regarding confidentiality, should be referred to the Docket Unit at docket@energy.ca.gov or (916) 654-5076.

Public Advisor and Other Commission Contacts

The CEC’s Public Advisor assists the public with participating in CEC proceedings. To request interpreting services, reasonable modification or accommodations, and other modifications, contact the Public Advisor at publicadvisor@energy.ca.gov or by phone at (916) 957-7910. Requests should be made as soon as possible but at least five days in advance. The CEC will

work diligently to meet all requests based on the availability of the service or resource needed.

Direct questions on the subject matter of this RFI to Cheng Moua at cheng.moua@energy.ca.gov or call (916) 237-2543.

Media

Direct media inquiries to the Media and Public Communications Office at mediaoffice@energy.ca.gov or call (916) 654-4989.

Subscribing to E-mail List Servers

Interested parties who would like to follow or participate in this proceeding should subscribe to the “Home Energy Rating and Labeling” subscription list found at the CEC’s [subscriptions webpage](https://www.energy.ca.gov/subscriptions), <https://www.energy.ca.gov/subscriptions>. By subscribing to this list, interested parties are consenting to receive information, notices, and other communications, including information associated with CEC’s efficiency-related rulemaking proceedings, by electronic mail.

Availability of Documents

All records for the process will be accessible in the [Whole-House Home Energy Rating and Labeling Pre-Rulemaking docket 23-HERS-02](https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-HERS-02), <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-HERS-02>. When new information is posted, an email will be sent to those on the “California Home Energy Rating and Labeling”, “Building Energy Efficiency Standards”, and “Efficiency Topics” subscription list.