

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-BSTD-01
<b>Project Title:</b>	2025 Energy Code Rulemaking
<b>TN #:</b>	257111
<b>Document Title:</b>	CHEERS - 15-Day Language Comments
<b>Description:</b>	N/A
<b>Filer:</b>	CHEERS Staff
<b>Organization:</b>	CHEERS
<b>Submitter Role:</b>	Applicant
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June 19, 2024

Commissioner Andrew McAllister  
California Energy Commission  
1516 Ninth Street, MS-39  
Sacramento, CA 95814

**Re: CEC docket 24-BSTD-01 – 15-Day Language Comments**

CHEERS appreciates the ongoing dialogue CEC Staff has had with the Providers on the proposed 2025 Standards. The following are CHEERS' comments on the released 15-day language.

**10-103.3(b)1Avii**

The ECC-Rater or ECC-Rater Company must register a Consumer Information Form with the ECC-Provider, which includes educational materials regarding the ECC Program, the roles and responsibilities of ECC-Raters, ECC-Providers and ECC-Rater Companies, and the means by which the owner may file a complaint. The Consumer Information Form must also include the owner's valid contact information, comprised of the owner's name, project address, phone number, and email. Failure to register a valid Consumer Information Form will make the ECC-Rater or ECC-Rater Company subject to discipline as described in Sections 10-103.3(d)7 and 10-103.3(d)8. For projects with no current owner in residence, the owner's contact information may be that of the landlord, developer, builder, or any other such person with a real property interest. The Consumer Information Form shall be developed by the ECC-Provider, and the Commission may request to review and provide recommendations. **For the purposes of a Consumer Information Form, register is defined as submitting the information outlined in this paragraph to the ECC-Provider.**

**CHEERS Reasoning:**

"Register" in other sections of the regulation indicates submittal to the Report Generator, validating against schema, and issuing a registration number. That is not practical in this context from both a schema and Rater workflow standpoint. This paragraph should be reworked to remove the term "register" or define it as provided in our addition above.

**10-103.3(d)5Ce**

Onsite Audits shall be performed when an ECC-Provider is investigating a complaint from a homeowner about a field verification and diagnostic test, **except when the installation has substantially changed since the original ECC inspection.**

**CHEERS Reasoning:**

We agree with CalCERTS' recommended change. CHEERS has also experienced many projects where the home or installation was meaningfully changed AFTER it was inspected by a Rater. In those cases, an onsite audit would add cost without providing useful information. CalCERTS suggestion will prevent unproductive time spent.

**10-103.3(d)5Cf**

Onsite Audits shall be performed for every 100 dwelling units or single family residences (or both in combination) in a single development constructed by a single developer that make use of the sample-group provisions (Building Energy Efficiency Standards Reference Appendix RA 2.6) **beginning with the 100<sup>th</sup> dwelling unit or single family residence.** ~~seventh sample group used in a single residential development.~~ Nothing in this provision shall require that any dwelling unit in any sample-group remain open beyond the requirements in Building Energy Efficiency Standards Reference Appendix RA 2.6. These Onsite Audits shall comply with the following:

**CHEERS Reasoning:**

We agree with CalCERTS' recommended change. This was discussed and understood in a meeting with CEC Staff, the Providers, and HERS Rater representatives. Requiring onsite audits for EVERY project that utilizes sampling presents substantial new staffing, travel, and coordination costs without obtaining meaningful quality assurance data.

Thank you,  
The CHEERS Team