

DOCKETED

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*Comment Received From: North Bay Home Performance
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Golden State Registry conflict of interest MUST be addressed

Additional submitted attachment is included below.

From: [David Bowers](#)
To: [Energy - Docket Optical System](#)
Subject: 22-HERS-01: Golden State Registry conflict of interest MUST be addressed
Date: Tuesday, February 18, 2025 6:42:34 PM
Attachments: [National Energy Testing Institute Inc-Stock Certificates.pdf](#)

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Dear CEC Staff;

As a dedicated building science professional, deeply invested in the integrity of California's energy efficiency industry, I find the current process for reviewing the Golden State Registry appalling. ARCXIS is touting the approval of GSR as the solution to soaring costs, yet it's all a charade. The same company, now under the control of New York's Saw Mill Capital, uses its size and clout to underbid every HVAC change-out project or production builder contract, underperforming the required inspections, and undermining the industry's standards and our credibility.

Let's not forget the acquisitions that have reshaped our landscape: ARCXIS (formerly DPIS) snapped up Energy Inspectors, once the largest new construction HERS rater in California, and then picked up iPermit, the state's largest HVAC change-out HERS rater, both in 2022. Now, with the Golden State Registry in the mix—and with iPermit and GSR operated by the same family (Ian Jacoby running iPermit and his father, Eric Jacoby, heading GSR)—it's clear that conflicts of interest abound. The CEO of ARCXIS, Jonathan Risch, is effectively signing off on a proposal that benefits his own subsidiaries and, by extension, his financial backers at Saw Mill Capital. This is a blatant, coordinated, conflict of interest, and it seriously undermines the credibility of the California HERS industry.

Moreover, the public review process for GSR leaves much to be desired. The California Energy Commission has provided nearly nothing for genuine public scrutiny. The information available pales in comparison to what was available for CalCERTS and CHEERS in past code cycles. How are we supposed to offer meaningful, industry-informed feedback when there's practically no information to review?

Here's what the CEC must do:

1. Provide more comprehensive public information about the GSR application. We need access to the details—especially any restrictions on GSR's operations in relation to iPermit—to fully understand the implications of this merger of interests.
2. Extend the public comment period through at least March, possibly April. Two weeks, with almost no data to digest, is simply not enough time for those of us on the front lines to form well-considered opinions.

It is imperative that the CEC reconsiders its approach to ensure transparency and integrity. Only then can we maintain public trust and uphold the standards that are critical to the future of California's energy efficiency efforts.

David Bowers

North Bay Home Performance



References:

<https://www.sawmillcapital.com/portfolio/arcxis/>

<https://www.arcxis.com/news-blog/dpis-builder-services-acquires-ei-companies-2>

<https://www.pnewswire.com/news-releases/arcxis-acquires-california-based-ipermit-301524128.html>