

DOCKETED

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Golden State Registry Transparency Required

Dear Commission,

Many stakeholders know or recognize me as I have had the privilege of serving the energy efficiency industry since inception. I have experienced firsthand the evolution of the HERS Program in California, starting with DuctTesters, Inc. where I helped build the company into one of the state's largest HERS Rating companies. Once acquired by QualityBuilt in 2021, I joined CalCERTS until it ceased operations in 2024. Since then, I am now a partner in building a new Energy Code Compliance Company. Like many cohorts, I have witnessed significant shifts in our industry over the years.

The close relationship between iPermit, ARCXIS, Service Champions, and the Golden State Registry is well known throughout the building industry. While I welcome healthy competition in the HERS Provider market, I am concerned about a scenario where iPermit and ARCXIS effectively have their own HERS Registry. This setup risks undermining fair competition, effectively crowding out independent HERS Rating firms, and reducing the incentive to maintain rigorous quality assurance standards across the board.

I respectfully urge that the operating restrictions addressing the conflict of interest among iPermit, ARCXIS and GSR be made available for public review. Transparency in this process is critical to ensuring that the industry remains competitive, credible, and committed to the highest standards of quality.

I urge you:

To make GSR QA policy and Team Qualifications public and open for review.
To provide more time for an adequate review of materials.

And if GRS is approved, I further urge you to mandate conditions of GSR approval:

Transparent Pricing that is posted online.

Transparent Fair QA policy.

Prohibit GSR from working with iPermit/Arcxis given that Ian Jacoby and Eric Jacoby are related and pose conflicts of interest.

Prohibit iPermit/Arcxis from accessing the GSR.

Respectfully,

Tamara Dias

Director Energy Code Compliance
Adroit Energy, Inc.