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Dear Commissioner McAllister

Introduction

The California Building Industry Association (CBIA) is a statewide trade association representing over 3,000 member companies involved in residential and light commercial construction. CBIA member companies are responsible for over 85% of the new single-family homes built in California annually.

Background

The California Builder Industry Association (CBIA) has played an active role in shaping the state's energy code development process over the past [7] code cycles. Our sustained involvement underscores our commitment to advancing building practices that ensure energy efficiency and foster innovation within the construction industry.

In our recent discussions, CBIA has focused on the new conflict of interest provisions in the upcoming 2025 code as a critical mechanism to safeguard the integrity of the HERS rater ecosystem. We believe that by ensuring impartiality and transparency within the HERS rating process, these provisions directly support the reliable implementation of the building energy code and promote a fair and effective market for all stakeholders.

Moreover, CBIA advocates for a transparent and efficiently operating HERS rater market. We recognize that such a market not only supports the California Energy Commission's efficiency goals but also plays a critical role in keeping new construction projects on schedule. While we recognize the benefits of having multiple HERS providers to foster competition and innovation, this must never come at the cost of the program's credibility. By promoting clarity and efficiency in HERS rating, we aim to streamline the construction process while reinforcing our commitment to high-quality, sustainable building practices.

Concerns

CBIA is deeply concerned about any potential connections between proposed HERS providers, such as the Golden State Registry, and established HERS rating groups. We believe that these relationships must be thoroughly examined and clearly understood by the public. Failing to do so jeopardizes the credibility and integrity of the upcoming 2025 energy code, undermining the transparent, fair, and effective framework necessary for a robust HERS rater ecosystem.

CBIA recommends the following actions:

- Increase transparency regarding the Golden State Registry application by releasing more detailed application information.
- Disclose comprehensive details about GSR's relationships with existing HERS rating groups, including any measures the California Energy Commission has implemented to address potential conflicts of interest.
- Extend the public review and comment period through April to ensure that all stakeholders have adequate time to assess the information and provide informed feedback.