

DOCKETED

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*Comment Received From: Chad McClure
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Additional submitted attachment is included below.

From: [A Hers Office](#)
To: [Energy - Docket Optical System](#)
Subject: docket number 22-HERS-01 and GSR HERS Provider and Data Registry Applications
Date: Wednesday, February 26, 2025 2:13:46 PM

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Dear California Energy Commission,

I am writing to provide comments regarding the application of the Golden State Registry (GSR) as a HERS Provider. Given the significant conflicts of interest surrounding this application, I urge the Commission to ensure full transparency in the approval process and implement strong safeguards to maintain fairness in the HERS market.

Based on the limited information available in the docket, it is evident that GSR is closely tied to iPermit. Stock certificates show Eric Jacoby as the owner, while Ian Jacoby, from the same family, runs iPermit. Furthermore, iPermit has well-documented ties to Service Champions and its CEO, Leland Smith. This raises serious concerns about potential preferential treatment, as it appears that iPermit and its parent company, Arcxis, may be establishing their own registry to serve their business interests rather than the industry as a whole.

The HERS industry plays a critical role in ensuring compliance with Title 24 and California's energy code, holding contractors and builders accountable for meeting efficiency standards. Raters work hard to uphold the highest standards of service and expertise, ensuring that the energy code fulfills its intended purpose. If a provider is allowed to operate with unchecked conflicts of interest—potentially favoring select raters through pricing advantages, relaxed oversight, or preferential treatment—it would destabilize the industry, undermine trust, and threaten the integrity of California's energy efficiency efforts.

While we recognize the Commission's desire to approve a second HERS Provider, this must be done with the utmost care. We strongly urge the Commission to:

1. Ensure Full Transparency – The approval process must be open, with all potential conflicts of interest disclosed and addressed.
2. Implement Oversight and Fair Pricing Protections – Safeguards must be in place to prevent anti-competitive behavior and ensure equal treatment of all Rater companies.
3. Require Independent QA Oversight – GSR should not be allowed to oversee the QA of iPermit, as this creates a direct conflict of interest that threatens the integrity of the HERS program.

The HERS program is vital to California's energy goals, ensuring compliance and delivering real benefits to homeowners. The CEC must carefully vet all applicants and take the necessary time to conduct due diligence before granting approval. The future of the HERS market depends on maintaining a fair, competitive landscape that prioritizes accountability and consumer protection over corporate interests.

I appreciate your time and consideration and urge the Commission to take these concerns seriously.

Sincerely,

Chad McClure

CEO

A HERS Rater, inc.

