

**DOCKETED**

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## **GSR - Conflict of Interest**

Echoing many of the other comments docketed, we believe that any potential conflict of interest between HERS Provider and HERS rater companies must be addressed. As an energy consultant we work directly with builders, raters, and providers and believe transparency in all aspects of the HERS program is critical. Additionally, the 2025 code overhaul to the ECC program was put into place, with years of effort, and a focal point was to avoid conflicts of interest. Specifically, the ECC program defines conflicts of interests as a Provider/Rater Company having financial interest in the builder/designer serving as responsible party and/or being a "close familial relative", both of which were approved. These same conflicts between a Provider and Rater Company could lead to more challenges, and would be more widespread, than conflicts we are resolving through the ECC program

Additionally, there is significant shift that requires ECC Provider to develop a disciplinary program for Rater Companies should any issues arise, to ensure the best results for the homeowners that this system was built to support. If there is a conflict of interest, how can we be assured that these programs will be enforced?

We understand the need for multiple Providers to provide balance in the market and ensure we do not have a monopoly, but at this point approval of GSR is solving one potential monopoly by creating an even larger potential monopoly. We also know that the currently approved CHEERS registry is not allowed to be a Rater Company and, presumably, not allowed to be tied to one by way of common ownership, family relative, etc... so we urge the CEC to ensure there is full transparency and enforce the same requirements to all Providers, Rater Companies, and Raters.

Thank You,  
Shawn Mayer