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## Concerns Regarding Potential Conflicts of Interest in HERS Rating Services

I hope this message finds you well. I am writing to express my concerns regarding the potential conflicts of interest that may arise from allowing a HERS rating company, such as iPermit, to also serve as a HERS provider under the Golden State Registry. The primary issue at hand is the competitive disparity that may emerge as a result of this dual role. As the largest HERS rating company, iPermit could leverage its substantial resources and market presence to gain preferential treatment in acquiring projects and visibility. This could severely disadvantage smaller HERS rating companies

and their contractors, who may lack the same level of access and support.

Such an imbalance threatens not only fair competition but also the diversity and integrity of the HERS rating system as a whole. It is crucial that we cultivate an environment where all stakeholders — particularly smaller businesses — can thrive and contribute effectively to our shared goals in energy efficiency and sustainability.

To address these concerns, I urge the California Energy Commission (CEC) to consider the following:

1. \*\*Preventing Conflicts of Interest\*\*: Establish clear guidelines that prohibit a HERS rating company from also functioning as a HERS provider to eliminate the potential for biased practices and favoritism.

2. \*\*Ensuring Fair Competition\*\*: Implement measures that promote a level playing field for all HERS rating companies, with particular attention to enhancing the visibility and accessibility of smaller businesses in the market.

3. \*\*Increasing Transparency\*\*: Provide clear communication on how the CEC plans to address these potential conflicts of interest. An explanation of the measures in place to ensure fairness and integrity within the HERS rating system would be greatly beneficial to all stakeholders.

I believe that by taking these steps, the CEC can help preserve a competitive landscape that benefits everyone involved and fosters a robust, diverse community of HERS rating professionals.

Thank you for considering my concerns. I look forward to your response and any information you can provide regarding the actions the CEC will take to maintain the integrity of the HERS rating system.

Sincerely,

Ted Wigler

Southwest HERS Raters