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Dear California HERS Raters and Participants in this Open Comment Period,

First and foremost, I want to express my gratitude for the opportunity to be part of this discussion. After years of dedicated effort, investment, and perseverance, we are encouraged to reach this stage in the approval process. The chance to engage with all of you in an open forum is invaluable, and I appreciate each participant's time and perspective.

At Golden State Registry (GSR), our mission is simple: to provide a service that works for you, enhances your ability to do your job well, and ensures fairness and integrity within the HERS program. I understand that everyone in this forum is advocating for their livelihood, and I fully align with that concern. Like many of you in this field, I have invested everything into this venture—not just financially, but with the kind of commitment that comes from knowing that my family and future depend on its success. Our goal is to establish and grow a program that strengthens compliance throughout California while also ensuring that there is space for all of us to operate successfully. We want to provide excellent services that align with the goals of the California Energy Commission (CEC) while offering more choices for those looking for an alternative.

There has been some speculation about GSR's independence, and I want to be absolutely clear: GSR is an independent company with no ownership stake held by any current Contractor, Rater, or Rating company. The code is very clear and specific on conflict of interest matters and we would not be proceeding if we were not certain that those requirements are being met. We are here to serve the industry as a whole, and our success depends entirely on providing value to you. We have submitted all relevant information to the CEC for their review and have been transparent as to our ownership, former employment, and affiliations. That an application to be a Provider and Registry should be made by those with experience and former employment within the industry is probably not at all surprising.

I would also like to address a few recurring themes in this discussion.

Pricing and Market Competition

To our knowledge, there has never been a standardized, transparent pricing model for HERS Providers, except when only a single Provider was available and could name their price. Volume pricing, specialized rates, and service-based adjustments have always been part of the industry landscape, just as various HERS Raters and companies charge differently for different services and the amount of work offered. This flexibility is what helps keep prices competitive. If, in the future, the Energy Code mandates uniform pricing, GSR will fully comply as this would then apply to all approved Providers and ensure there is not an uneven playing field.



It is also worth considering whether rigid pricing controls would truly benefit the industry. If Providers were subject to strict price regulations, should HERS Raters and Rating companies also be required to charge a fixed rate for their services? What if that mandated price was too low for you to remain profitable or too high for your customers to afford? One of the tenets of the code is that it must be cost effective. We already have the challenge of a relatively low participation rate in certain sectors due to the added cost of Title 24 requirements, which disadvantages those companies and contractors that perform their work according to code. In economic theory, competition encourages fair pricing and better service. Our goal is to provide a cost-effective alternative that gives Raters and Rating companies more choice while maintaining high standards of service and compliance.

Quality Control (QA) and Integrity

I want to be absolutely clear in my agreement with those who have raised concerns about fair enforcement of Quality Assurance (QA). If any rating company, Rater, or Provider were to receive an unfair advantage due to insider deals, preferential treatment, or lax enforcement, it would undermine the integrity of the entire program. This is an issue the CEC has been aware of and has worked diligently to address, particularly in preparation for the 2025 Energy Code updates. Their efforts to ensure consistent enforcement are commendable and critical to maintaining trust in the HERS program.

At GSR, we have made it clear to every Rater and Rating company that has reached out to us: we will enforce QA requirements equitably, efficiently, and to the letter. Compliance should not depend on industry relationships or financial incentives. We believe that as a new Provider, we have a unique opportunity to start our journey with full compliance, transparency, and a commitment to fairness. We have demonstrated in our software presentations that our system will allow full CEC oversight of QA enforcement, ensuring accountability for all participants.

For those of you who take pride in doing things the right way, we want to work with you. We see ourselves as a partner in this process, ensuring that QA is applied fairly while supporting the professionals who uphold the integrity of this industry, and weeding out those who do not.

An Invitation to Connect

For those of you who are happy with your current Provider and services, we are glad that your needs are being met. For those looking for an alternative, we invite you to connect with us, get to know our team, and see what we have to offer. Our goal is not just to provide a service but to build relationships with the professionals who rely on it. Please feel free to reach out to me directly at jon@gregistry.org, and I would be happy to answer any questions.



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I also want to take a moment to thank the CEC team for their tireless efforts in reviewing applications and ensuring that Registry applications meet the necessary code requirements. This is not a simple process, and we appreciate their diligence. I am also incredibly proud of my GSR team, who have worked through countless challenges to bring us to this moment. We look forward to the final steps in this process and, hopefully, celebrating with all of you soon.

To everyone who has reached out directly in support of GSR, thank you! Your enthusiasm for having more options in the market fuels our commitment to delivering the best possible service. We look forward to earning your trust and working together to strengthen the future of the HERS industry.

Sincerely,

Jonathan Johnson

CEO, Golden State Registry

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