DOCKETED	
Docket Number:	22-HERS-01
Project Title:	2022 HERS Provider Applications for the 2022 Building Energy Efficiency Standards
TN #:	262052
Document Title:	Valley Duct Testing Comments - Concerns about Potential Conflicts of Interest being a provider
Description:	N/A
Filer:	System
Organization:	Valley Duct Testing
Submitter Role:	Public
Submission Date:	3/2/2025 5:54:23 PM
Docketed Date:	3/3/2025

Comment Received From: Valley Duct Testing Submitted On: 3/2/2025 Docket Number: 22-HERS-01

Concerns about Potential Conflicts of Interest being a provider

Valley Duct Testing is a leader in the HERS market in Northern California. The raters and support staff at VDT work hard to support our builders and installers in complying with the energy code. The work is complex and at times frustrating, but we strive to do the best job we can for our customers. With this in mind, it will be impossible to compete fairly in the marketplace if the Jacoby Family is allowed to develop its own registry. The conflicts of interest must be addressed and conditions on approval put in place so that all Raters and rating companies are treated equally - this includes pricing, quality assurance oversight, project management tools, energy consultant and rater fees, registry features, QA, etc. Raters should compete based on expertise, efficiency, and service, not bases on the connections to deep discounts manipulated by large companies.

VDT does not get involved in the politics or policies that arise for the CEC. We keep our business focused on supporting our clients and doing good work. However, I must speak up to support my team. As much as we would like to see another provider in the marketplace and truly believe it would be in the all the raters and the companies they work for best interest, this is not the appropriate solution. Please consider the ramifications for all companies when making your decision.

Thanks,

John Flores - President of Valley Duct Testing