

**DOCKETED**

<b>Docket Number:</b>	22-HERS-01
<b>Project Title:</b>	2022 HERS Provider Applications for the 2022 Building Energy Efficiency Standards
<b>TN #:</b>	262689
<b>Document Title:</b>	Executive Director Recommendation to Certify GSR as a HERS Provider and for Approval of the GSR Residential Data Registry
<b>Description:</b>	Executive Director Recommendation to (1) Certify GSR as a Home Energy Rating System Provider and (2) Approve the GSR Residential Data Registry under the 2022 Energy Code. The HERS provider and data registry applications specify a scope of approval limited to prescriptive compliance of single-family residential space conditioning system alterations under the 2022 Energy Code.
<b>Filer:</b>	Archana Etikala
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	4/15/2025 10:27:56 AM
<b>Docketed Date:</b>	4/15/2025



# MEMORANDUM

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**TO:** CALIFORNIA ENERGY COMMISSION

**FROM:** DREW BOHAN  
EXECUTIVE DIRECTOR  
CALIFORNIA ENERGY COMMISSION  
715 P STREET  
SACRAMENTO, CALIFORNIA 95814

**SUBJECT:** CEC EXECUTIVE DIRECTOR RECOMMENDATION TO CERTIFY GSR AS A HOME ENERGY RATING SYSTEM PROVIDER AND FOR APPROVAL OF THE GSR RESIDENTIAL DATA REGISTRY APPLICATION

**DATE:** APRIL 16, 2025

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## BACKGROUND

The Warren-Alquist Act directs the California Energy Commission (CEC) to establish criteria for a statewide Home Energy Rating System (HERS) program. The CEC's California HERS program regulations establish requirements for home energy rating services offered by providers (including the providers' training and certification of raters) and for the CEC's certification of providers. The regulations define a provider as an organization that administers a California HERS program.<sup>1</sup>

The 2022 Energy Code requires field verification and diagnostic testing (FV&DT) of specified residential energy efficiency measures to demonstrate compliance with the Energy Code.<sup>2</sup> This testing must be performed by raters who are certified by a CEC-approved HERS provider. Additionally, the 2022 Energy Code describes the approval process as well as functional and technical requirements for a residential data registry. Finally, "[f]or residential compliance document registration, the Registration Provider shall be approved in accordance with the requirements in Section JA7.8 and shall also be a HERS Provider approved by the CEC."<sup>3</sup>

National Energy Testing Institute, doing business as Golden State Registry (GSR), has applied for certification as a California HERS program provider to administer the California HERS program, which includes training, certifying, and overseeing HERS raters to conduct FV&DT for Energy Code compliance. GSR has also applied for

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<sup>1</sup> California Code of Regulations, title 20, section 1671.

<sup>2</sup> California Code of Regulations, title 24, part 1, section 10-103(a).

<sup>3</sup> 2022 Reference Appendices, Joint Appendix section JA7.4.1 Registration Provider

approval of its residential data registry under the 2022 Energy Code. The HERS provider and data registry applications specify a scope of approval limited to prescriptive compliance of single-family residential space conditioning system alterations under the 2022 Energy Code (see Table 2 in EXHIBIT A).

## SEQUENCE OF EVALUATION

- On January 27, 2023, GSR submitted an application to the CEC requesting to be approved as a HERS provider and data registry under the 2022 Energy Code.
- CEC staff reviewed the application material and found some deficiencies. CEC staff issued a deficiency letter to GSR including a checklist of application requirements, dated April 10, 2023.
- Between October 2024 and January 2025, GSR submitted subsequent application materials to address the deficiencies described in CEC's letter.
- On February 14, 2025, CEC staff determined the application to be complete. Pursuant to Title 20 of the California Code of Regulations (CCR), section 1674(c)(2), and Title 24, section 10-110(b), a public notice was posted to docket number [22-HERS-01](#).<sup>4</sup> The notice provided an opportunity for public comment, and any comments received by March 5, 2025, were considered.
- After reviewing public comments and further considering GSR's complete application, CEC staff requested additional information regarding the provider and data registry application submissions. In March 2025, GSR subsequently submitted revised application exhibits in response to CEC staff inquiries, EXHIBIT A, attached to this memo, provides further details.
- CEC staff reviewed all of the materials and concludes that GSR has met the applicable requirements in the 2022 Energy Code and the HERS Program regulations. General CEC staff recommendations regarding application requirements and a comprehensive regulatory checklist are [available on the CEC website](#).<sup>5</sup>

## CONCLUSION AND RECOMMENDATION

Pursuant to Title 20, section 1674(c)4, I recommend the CEC approve the Golden State Registry HERS provider application.

Pursuant to Title 24, section 10-110(e), I recommend the CEC approve the Golden State Registry residential data registry application.

Based on CEC staff review and validation of the GSR application, I recommend that the CEC confirm these findings, certify GSR as a HERS provider, and approve the GSR residential data registry application within the scope of approval described in EXHIBIT A.



April 14, 2025

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Drew Bohan  
Executive Director  
California Energy Commission

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Date

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<sup>4</sup> Available at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=22-HERS-01>

<sup>5</sup> Publication Number CEC-400-2022-001. Available at <https://www.energy.ca.gov/publications/2022/home-energy-rating-system-provider-application-and-recertification-process-staff>

## **EXHIBIT A**

### **CEC STAFF EVALUATION – GSR**

#### **2022 HERS PROVIDER AND RESIDENTIAL DATA REGISTRY APPLICATIONS**

##### **SCOPE OF APPROVAL**

Golden State Registry (GSR) submitted applications to the California Energy Commission (CEC) requesting certification as a Home Energy Rating System (HERS) provider under the California HERS program (California Code of Regulations, title 20, sections 1670-1675) and approval of a residential data registry under section 10-109(b) of the 2022 Building Energy Efficiency Standards (Energy Code). The HERS provider and data registry applications specify a scope of approval limited to single-family residential space conditioning system alterations under the 2022 Energy Code.

##### **CEC STAFF ANALYSIS**

###### **HERS Provider Application Requirements:**

1. An introduction that includes the following:
  - a. A statement that ratings are accurate, consistent, and uniform, utility bill estimates are reasonable, and recommendations on cost-effective energy efficiency improvement measures are reliable. (Title 20 Section 1674(a)(8))
  - b. A statement that the applicant understands and will not knowingly fail to comply with the requirements of the HERS regulations. (Title 20 Section 1674(a)(9))
  - c. A statement under penalty of perjury that all statements in the application are true, provided in the form specified by Section 2015.5 of the Code of Civil Procedure. (Title 20 Section 1674(a)(10))

GSR submitted the following materials demonstrating that it meets the applicable requirements in the above categories: (1) Exhibit B2- Statement on Accuracy of Ratings. (2) Exhibit B1-Statement under Penalty of Perjury. (3) Exhibit B3-Statement Regarding Regulations. (4) Exhibit A2a- Provider Applicant Ownership and Affiliations.

2. Applicant identification:
  - a. The applicant must list its name, address, telephone number, its principal place of business, and where and upon whom service of legal process can be made. (Title 20, Section 1674(a)(4))
  - b. If the applicant is a corporation, a copy of the articles of incorporation and current bylaws. (Title 20, Section 1674(a)(5))
  - c. If the applicant is a partnership, list the names, addresses, telephone numbers, partnership status of all partners, and a copy of current partnership agreement. (Title 20 Section 1674(a)(6))
  - d. The applicant must list names, addresses, telephone numbers, and business relationships of all the applicants' owners, parents, subsidiaries, and affiliates. (Title 20, Section 1674(a)(7))

GSR submitted the following materials demonstrating that it meets the applicable requirements in the above categories: (1) Exhibit A1- Provider Applicant Company Information. (2) Exhibit A1a - National Energy Testing Institute, Inc – Articles of Organization. (3) Exhibit A2c- National Energy Testing Institute of Bylaws. (4) Exhibit A1c- Statement of Information. (5) Exhibit A2a-Provider Applicant Ownership and Affiliations. National Energy Testing Institute, Inc. a corporation owned by Jonathan Johnson (CEO) and Eric Jacoby (CFO), doing business as Golden State Registry, with its principal place of business located at 430 Villa Point Dr., Newport Beach, California 92660.

3. A complete copy of all rating procedures, manuals, handbooks, rating system descriptions, and training materials (Title 20, Section 1674(a)(1)):
  - a. Whole-house rating procedures including the whole-house procedures as specified in the HERS Technical Manual.

- b. FV&DT procedures.
- c. Manuals, handbooks, quick-reference sheets, video, and all other educational resources or training materials.
- d. A list of exams including the content, duration of each exam, platform, and methods of proctoring.
- e. A description, location, and pictures of the field house used for training and exams.
- f. Rating system descriptions including how the system meets the requirements in the HERS Technical Manual and the Reference Appendices.

To meet the applicable requirements in the above category, limited to FV&DT in single-family residential space conditioning system alterations under the 2022 Energy Code, GSR submitted the following materials: (1) Exhibit C1- GSR Training Program Details 2022. (2) Exhibit- C2a GSR Training Course 2022 1-12. (3) Exhibit- C2b GSR Training Course 2022 13-18. (4) Exhibit C3 Rater Test Questions. (5) Exhibit C2d-Mathematical Equations Necessary to Utilize the Rating System. (6) Exhibit C4- GSR Software Training Manual.

- 4. A detailed explanation of how the applicant's rating system meets each requirement of Section 1672 of the HERS Regulations (Title 20 Section 1674(a)(2)):
  - a. California Whole-House Home Energy Rating or a California Home Energy Audit. [Not applicable.]
  - b. Data Collection.
  - c. Data Analysis Requirements. [Not applicable.]
  - d. Energy Uses Rated. [Not applicable.]
  - e. Onsite Renewable Generation. [Not applicable.]
  - f. Rating Scale. [Not applicable.]
  - g. Method of calculating TDV energy. [Not applicable.]
  - h. Utility Bill Analysis. [Not applicable.]
  - i. Recommendations for Energy Efficiency Improvements. [Not applicable.]
  - j. Greenhouse Gas Emissions. [Not applicable.]
  - k. HERS Report. [Not applicable.]
  - l. Field Verification and Diagnostic Testing.
  - m. Provider and Rater Conduct and Responsibility policy.

GSR is not seeking whole house certification or recertification in this application. For other applicable requirements such as 1672(l) and (m), GSR submitted the following materials to meet the requirements: (1) Exhibit C1- GSR Training Program Details 2022. (2) Exhibit- C2a GSR Training Course 2022 1-12. (3) Exhibit- C2b GSR Training Course 2022 13-18. (4) Exhibit B4-GSR 2024 Application for Provider and Registry.

- 5. A detailed explanation of how the applicant meets each requirement of Section 1673 (Title 20 Section 1674(a)(3)):
  - a. Training and Certification Procedures for Raters.
  - b. Rater agreements.
  - c. Building Performance Contractor Agreements. [Not applicable.]
  - d. Rater and Building Performance Contractor Registry.
  - e. Data Maintenance.
  - f. Field Verification and Diagnostic Testing Evaluation.
  - g. Data Submittal.
  - h. Training Materials Retention.
  - i. Quality Assurance.
  - j. Conflict of interest.
  - k. Improvement measures cost database. [Not applicable.]

GSR is not seeking whole house certification or recertification in this application. GSR submitted materials to meet all the applicable requirements in the above section. These are described below:

In response to Sections 1673(a) and 1673(h), GSR submitted training program details, classroom materials, test questions, and a software training manual. Relevant submissions include (1) Exhibit C1- GSR Training Program Details 2022. (2) Exhibit- C2a GSR Training Course 2022 1-12. (3) Exhibit- C2b GSR Training Course 2022 13-18. (4) Exhibit C3 Rater Test Questions. (5) Exhibit C4- GSR Software Training Manual. (6) Exhibit B4- GSR 2024 Application for Provider and Registry.

In response to Section 1673(b), GSR submitted Exhibit B6- Golden State Registry Rater Agreement.

In response to Section 1673, items (d), (e), (f), and (g), GSR submitted Exhibit B4-GSR 2024 Application for Provider and Registry.

In response to Section 1673(j), GSR attested that there is no conflict of interest between its owners and any company that is an installing contractor or offers FV&DT services. GSR submitted the following materials: (1) Exhibit A2a- Provider's Owners, Parents, Subsidiaries and Affiliates. (2) Exhibit A2c-National Energy Testing Institute Bylaws. (3) Exhibit A2d- National Energy Testing Institute Inc- Stock Certificates. (4) Exhibit A2b- Statement by Eric Jacoby on Affiliations. (5) Exhibit B4- Requirements in section 1673-Response.

CEC staff reviewed and evaluated the GSR application materials with respect to regulations for conflict of interest per the 2022 Energy Code and determined that there is no conflict of interest.

In response to Section 1673(iy), GSR submitted its quality assurance program details and its quality assurance evaluator qualifications, including, (1) Exhibit B5- Quality Assurance Compliance. (2) Exhibit B7- Quality Assurance Team Information.

In response to Section 1673(i)(5), GSR submitted its complaint response system details, including, Exhibit B5- Quality Assurance Compliance.

CEC staff reviewed and verified the GSR application materials as they pertain to the requirements in the California HERS Program and the 2022 Energy Code. Table 1 lists the pertinent application materials reviewed and approved.

**TABLE 1: DOCUMENTS EVALUATED FOR THE GSR HERS PROVIDER AND RESIDENTIAL DATA REGISTRY APPLICATIONS**

<b>TN #</b>	<b>Document Title</b>
248573	Exhibit A1a – National Energy Testing Institute, Inc – Articles of Organization
248566	Exhibit A1b – Golden State Registry FBN
248565	Exhibit A1c – Statement of Information
248564	Exhibit A1 – Provider Applicant Company Information
248563	Exhibit B1 – Statement under Penalty of Perjury
248562	Exhibit B2 – Statement on Accuracy of Ratings
248561	Exhibit B3 – Statement Regarding Regulations
260688	Exhibit A2c – National Energy Testing Institute Bylaws

<b>TN #</b>	<b>Document Title</b>
260689	Exhibit A2d – National Energy Testing Institute Inc - Stock Certificates
260714	Exhibit B9 – Registration Provider Applicant Certification Statement
249132	Exhibit A2 – Provider Applicant Ownership and Affiliations
249133	Exhibit B4 – Requirements in section 1673 - Response
262227	Exhibit B5 – Quality Assurance Compliance
262231	Exhibit B6 – Golden State Registry Rater Agreement (2024)
249130	Exhibit B7 – Quality Assurance Team Information
259640	Exhibit C2d –Mathematical Equations Necessary to Utilize the Rating System
259638	Exhibit C2a – GSR Training Course 2022 1-12
259639	Exhibit C2b – GSR Training Course 2022 13-18
260190	Exhibit C1 – GSR Training Program Details 2022
260189	Exhibit C3 – Rater Test Questions
262147	Exhibit A2a – Provider Applicant Ownership and Affiliations
262146	Exhibit A2b – Statement by Eric Jacoby on Affiliations
262230	Exhibit B10 – Application for Approval of GSR Data Registry
262232	Exhibit C4 – GSR Software Training Manual
262229	Exhibit B4 – GSR 2024 Application for Provider and Registry
262226	Exhibit D1 – Registry Capabilities
262171	Exhibit D2 – Final Application Document List for Version 1
262602	Exhibit D3 – Proof of Self-Testing Documentation

### Residential Data Registry Application Requirements

Title 24, Section 10-109(b) gives applications requirements for various systems and services, including data registries. An application shall include:

1. A description of the functional or analytical capabilities of the compliance software, alternative component package, calculation method, exceptional method, data registry or related data input software, and alternative field verification protocol; and

2. A demonstration that the criteria in Section 10-109 are met.
3. Reference Joint Appendix JA7.8 expands on these requirements needed for data registry approval, including a reference to Sections 10-109 and 10-110. The application should include: A certification statement and evidence that the residential data registry conforms to the requirements specified in Reference Joint Appendix JA7.8.3.1:
  - a. Capability to produce and manage registered documents. (JA7.5)
  - b. Electronic signature capability and manage authorization of users. (JA7.6.3.2.1)
  - c. Document data validation. (JA7.6.3.2.2)
  - d. Signer review and signature actions. (JA7.6.3.2.3)
  - e. Digital signature and digital certificate actions. (JA7.6.3.2.4)
  - f. Capability to transmit secured documents and data to the CEC Compliance Document Repository. [Not applicable.]
  - g. Document retention capability. (JA7.6.3.2.6)
  - h. Capability to receive and process electronic data using best practices for secure data exchange, using data sources and procedures approved by the CEC for registering compliance documents. (JA7.6.3.2.7; JA7.7)
  - i. Capability for data exchange with the compliance report generation services made available by the CEC to generate formatted electronic documents. [Not applicable.]
4. Data registry user manual. (JA7.8.5)

GSR's Application with its limited scope demonstrates that its Residential Data Registry meets the applicable requirements of a residential data registry in sections 10-109 and JA7 of the 2022 Energy Code.

CEC staff also tested the proposed registry to validate the applicant's testing evidence.

The GSR residential data registry application addresses these requirements in Exhibit B4-GSR 2024 Application for Provider and Registry, Exhibit B10-Application for Approval of GSR Data Registry, Exhibit C4-GSR Software Training Manual, and Exhibit D1-Registry Capabilities.

Table 2 lists the compliance forms that GSR specified in its application scope (exhibit D1-Registry Capabilities). This is a subset of form types that appear in the [2022 Data Registry Requirements Manual](#), Appendix A.<sup>6</sup>

**TABLE 2: GSR 2022 COMPLIANCE DOCUMENT SCOPE OF APPROVAL**

Document Number	Document Type	Document Description
CF1R-ALT-02-E	Prescriptive Certificate of Compliance	HVAC Alterations
CF2R-MCH-01b-E	Certificate of Installation	HVAC Systems, Ducts and Fans for Prescriptive Alterations
CF2R-MCH-20a-H	Certificate of Installation	Duct Leakage Measurement, New System
CF2R-MCH-20d-H	Certificate of Installation	Duct Leakage Measurement, Altered (Existing) System
CF2R-MCH-20e-H	Certificate of Installation	Sealing All Accessible Leaks Using Smoke Test
CF2R-MCH-22a-H	Certificate of Installation	Forced Air System Fan Efficacy Measurement - Newly Installed

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<sup>6</sup> Publication Number CEC-400-2022-011



Document Number	Document Type	Document Description
		Non-Zoned Systems or Zoned Multi-Speed Compressor
CF2R-MCH-22b-H	Certificate of Installation	Forced Air System Fan Efficacy Measurement - Newly Installed Zoned Single-Speed Compressor Systems
CF2R-MCH-23a-H	Certificate of Installation	Forced Air System Airflow Rate Measurement - Newly Installed non-Zoned systems or Zoned Multi-speed Compressor Systems
CF2R-MCH-23b-H	Certificate of Installation	Forced Air System Airflow Rate Measurement Newly Installed Zoned Single - Speed Compressor Systems
CF2R-MCH-23c-H	Certificate of Installation	Forced Air System Airflow Rate Measurement - Alternative to Compliance with Minimum System Airflow Requirements for Altered Systems
CF2R-MCH-25a-H	Certificate of Installation	Refrigerant Charge Verification - Superheat Method
CF2R-MCH-25b-H	Certificate of Installation	Refrigerant Charge Verification - Subcooling Method
CF2R-MCH-25c-H	Certificate of Installation	Refrigerant Charge Verification - Weigh-In charging Procedure
CF2R-MCH-25e-H	Certificate of Installation	Refrigerant Charge Verification - Winter Setup
CF2R-MCH-25f-E	Certificate of Installation	Refrigerant Charge Verification - Packaged System Manufacturer
CF2R-MCH-28-H	Certificate of Installation	Return Duct Design and Air Filter Device Sizing According to Tables 150 B or C
CF3R-MCH-20a-H	Certificate of Verification	Duct Leakage Measurement, New System
CF3R-MCH-20d-H	Certificate of Verification	Duct Leakage Measurement, Altered (Existing) System
CF3R-MCH-20e-H	Certificate of Verification	Sealing All Accessible Leaks Using Smoke Test
CF3R-MCH-22a-H	Certificate of Verification	Forced Air System Fan Efficacy Measurement - Newly Installed Non-Zoned Systems or Zoned Multi-Speed Compressor
CF3R-MCH-22b-H	Certificate of Verification	Forced Air System Fan Efficacy Measurement - Newly Installed Zoned Single-Speed Compressor Systems

Document Number	Document Type	Document Description
CF3R-MCH-23a-H	Certificate of Verification	Forced Air System Airflow Rate Measurement - Newly Installed non-Zoned systems or Zoned Multi-speed Compressor Systems
CF3R-MCH-23b-H	Certificate of Verification	Forced Air System Airflow Rate Measurement Newly Installed Zoned Single-Speed Compressor Systems
CF3R-MCH-23c-H	Certificate of Verification	Forced Air System Airflow Rate Measurement - Alternative to Compliance with Minimum System Airflow Requirements for Altered Systems
CF3R-MCH-25a-H	Certificate of Verification	Refrigerant Charge Verification-Superheat Method
CF3R-MCH-25b-H	Certificate of Verification	Refrigerant Charge Verification - Subcooling Method
CF3R-MCH-25c-H	Certificate of Verification	Refrigerant Charge Verification - Weigh-In charging Procedure
CF3R-MCH-25d-H	Certificate of Verification	Verification of Fault Indicator Display
CF3R-MCH-25e-H	Certificate of Verification	Refrigerant Charge Verification - Winter Setup
CF3R-MCH-28-H	Certificate of Verification	Return Duct Design and Air Filter Device Sizing According to Tables 150 B or C

## CONCLUSION

CEC staff reviewed the confidential and non-confidential information filed in docket number 22-HERS-01 and verified that all the requirements of the Title 20 California HERS Program and the 2022 Energy Code are met with the exceptions as noted in this staff evaluation. Therefore, CEC staff recommends the GSR HERS Provider application for approval within the limited scope of prescriptive single-family residential HVAC alterations. CEC staff also recommends approval of the 2022 Energy Code residential data registry application for registration of single-family residential alterations compliance documentation.