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on HERS Rater

Additional submitted attachment is included below.

From: [Jim Apperson](#)
To: [Energy - Docket Optical System](#)
Subject: 23-HERS-01 HERS Rater Comments
Date: Sunday, March 19, 2023 5:20:15 PM

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CEC,

The California Energy Commission must not revoke the HERS Program for Field Verification and Diagnostic Testing without first safeguarding the HERS Program for future code cycles. The Commission's attempt to revoke an entire industry without first identifying what new rules will be adopted in its place is reckless and unlawful. The proposed rules under 23-HERS-01 will put me and my company out of business and must not be adopted. Completely wiping out HERS penalizes the many HERS raters who took their jobs seriously and tried their best to do what was right. You'll be destroying an entire industry to punish a few bad apples. You have a good group of talented individuals who believe in energy conservation and who have finally convinced HVAC contractors to do quality work. The program is workable, don't scrap the whole thing and start over. If there was a fault it was with the structure of the program that made no requirements for quality assurance or a way to check that all raters were entering false information. So of course you will have individuals who game the system if there is no one checking their work. It should have been obvious that a HERS rater can't do 8 duct test per day for 7 days each week but there wasn't anyone to stop them or insist on penalties for misbehaviour. The HERS program is not beyond repair, it just needs some QA procedures and someone to make sure things are being done on a professional level.

Jim Apperson
Apperson Energy Management