

DOCKETED

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Hers Rater

Additional submitted attachment is included below.



March 27, 2023

To: California Energy Commission Staff

From: Paul A. Dunn, HERS Rater, Central Coast Energy Compliance

RE: 23-HERS-01 (Proposed Changes to HERS Program)

I have been a certified HERS rater since 2006. I was initially trained under CHEERS by Gary Wollin for the 2005 code cycle and then took subsequent training under Calcerts for all possible HERS skill sets and accreditations. I then went on to become a Building Performance Institute (BPI) certified Building Analyst.

In the years since, I have personally conducted over 3,000 duct leakage tests, over 400 blower door tests, inspected hundreds of new homes for QII and have completed 74 HERS II whole-house energy ratings. Yes, I am active and passionate about home energy.

To this end I am quite certain that my testing and inspections has directly resulted in the discovery of THOUSANDS of wasted btu's of energy. I have seen disconnected HVAC ducts, missing plenums, horrible insulation practices, etc.

My work has proved that the HERS Rater is a vital component of California's building industry.

In addition, the HERS Rater is often THE interface between consumer and energy code. This was imparted early on in my training with Calcerts, that advised all raters to be "Raters as Educators" in code awareness with homeowners, contractors and architects.

With this in mind, I am asking the California Energy Commission to 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.

Respectfully,

A handwritten signature in black ink, appearing to read "Paul A. Dunn". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul A. Dunn
Central Coast Energy Compliance
CalCERTS Rater #CC2005798