DOCKETED	
Docket Number:	23-HERS-01
Project Title:	2023 Repeal of the Field Verification and Diagnostic Testing requirements in Title 20
TN #:	252590
Document Title:	Response to Comments
Description:	N/A
Filer:	Joe Loyer
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	10/13/2023 9:15:31 AM
Docketed Date:	10/13/2023

Amendment of the HERS Regulations

Title 20, Sections 1670 - 1675

Response to Comments

45-Day comment period: February 9 – March 27, 2023

Public Hearing: March 28, 2023 15-Day comment period: June 1-16, 2023

TN#	Author	Comment	Response
<u>248952</u>	CalCERTS 02/24/2023 45-Day Comment	Summary of Comment: Commenter makes five objections to the rulemaking, and requests the CEC to join the Title 20 and Title 24 rulemakings so as to "correct its substantial failure to comply with California's Administrative Procedures Act." The five objections are as follows: 1. The rulemaking is not supported by the rulemaking file. 2. The ISOR is not valid. 3. The economic impact assessment is false. 4. The economic and fiscal impact statement (Form 399) is false. 5. The process is unfair.	Staff disagrees with the comments because each is based on a mistaken assumption that this rulemaking will terminate the HERS program, and therefore the rulemaking is either unsupported or speculative. In fact, this rulemaking merely removes certain administrative regulations pertaining to field verification and diagnostic testing, a separate program from HERS, so that they can concurrently be added to the Title 24 Energy Code – to the extent the provisions are not already provided for in Title 24. The adoption of the corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20, so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities. Notwithstanding staff's disagreement with the comment, staff published 15-day language to clarify the intent and effect of this rulemaking and ensuring that this rulemaking will not become effective until the date the Title 24 rulemaking becomes effective, therefore removing any possibility of a regulatory gap. In response, commenter thanked CEC staff at a June 9, 2023, workshop concerning the complementary, Title 24 rulemaking (2022 Field Verification and Diagnostic Testing OIR Proceeding, Transcript of June 9, 2023 FV&DT Workshop, Page 31, Lines 11-17).

TN#	Author	Comment	Response
<u>249162</u>	CHEERS 03/15/2023 45-Day Comment	Summary of Comment: Commenter references comment by CalCERTS (TN 248952) regarding claims the Commission is not meeting their obligation of assessing the direct impacts of its proposed action on HERS Raters as required by California's Administrative Procedures Act (APA) and requests the Commission meets with both Providers to discuss the rulemaking and compliance with the APA.	Comment acknowledged and accepted. As stated in response to comment TN 248952, staff disagrees with the comments. Notwithstanding this, staff proposed 15-day language to clarify that the intent and effect of this rulemaking and ensuring that this rulemaking will not become effective until the date the Title 24 rulemaking becomes effective, therefore removing any possibility of a regulatory gap in the HERS program.
<u>249166</u>	E Castellanos 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249167</u>	Dan Conrad Chief Financial Officer Builder Services Network Inc. 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249168</u>	DANIEL DAGESYAN HERS RATERS, LLC. 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249169</u>	Dmitri Grigorenco Express Duct Test 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249170</u>	Allen Gates 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249171</u>	Jeff Drucker 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249172</u>	Nathan Krantz CxA, RA, LEED AP, GPR, HERS, CEA Krantz Consultants, LLC 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249173</u>	Melissa Carstairs Carstairs Energy Inc. 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249174</u>	ECO HERS Team ECO HERS LLC 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249175</u>	Brandon Kondus Central Valley Raters 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249176</u>	Kevin Rasmussen Calcerts Certified HERS Rater So Cal HERS Raters 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249177</u>	John Hutson Builder Services Network dba California Living & Energy 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249178</u>	Will Simco Owner Aircert Energy Ratings 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249179</u>	Greg Switzer, P.E Partner Energy 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249180</u>	Walter Jackson Duct Dynasty 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249181</u>	Cody Bathke Partner Energy 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249182</u>	Certified Energy Services 1 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249183</u>	Jeremiah Ellis Director of Business Development CalCERTS, Inc. 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249184</u>	Richard Barlow Absolute Efficiency Group 03/15/2023 45-Day Comment	Summary of Comment: 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. I have invested several hundred thousand dollars in equipment, training and also employ a staff of 8 people and will seek reimbursement for funds which would have been used otherwise as a form of protecting my financial livelihood.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249185</u>	Michael Jaeggli RETKNO Consulting 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249186</u>	Kyle Brumfitt Partner Energy 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249187</u>	Micah Calhoon 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249188</u>	Larry Eichel CalCERTS HERS Rater 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249189</u>	Dan Granback Director of Project Operations – West Quality Built 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249190	JACOB WILSON CalCERTS/CHEERS HERS Rater ABCO Construction Services, LLC 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249191	Dave Slama A-1 Duct Rating IDST Energy Consulting 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249192	Frank Cruz Cal Star Energy Rating 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249193</u>	Kenneth Waggoner 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249194	Dennis Meredith CalCERTS Certified Rater CHEERS Certified Rater ELITE Duct Testing 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249195</u>	Raymond Hernandez Co-Owner Absolute Efficiency Group 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249196</u>	Pete Disch 03/15/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249197	Eric Bergesen Home Energy HERS Testing 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249198	Karen Avila HERS Rater 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249199	Rodney Woodard Sun Woodard Enterprises And hvac company 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249200	Steven G. Wilson HERS Rater and Owner Habitat Energy Advisors 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249201</u>	Jason Socorro CHEERS Rater & CalCERTS HERS II Rater Reliance Energy Services 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249202	Cornelio Medelin 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249203	Darrien Colaw 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249204	Catherine Runnells Owner Energy Guru 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249205</u>	Office Manager Quality, skill & Pride 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249206</u>	Eric Thomas HERS Rater ENERGYGURU 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249207</u>	C. McClure CEO Quality, skill & Pride 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249208	Michael Wizmann 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249209	Graham Holloway President Amphibious Construction 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249210</u>	Gray Gautereaux Energy Program Manager 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249211</u>	Liz Longeway 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249212	AirFlow Heating-AC 03/16/2023 45-Day Comment	The california Energy Commission must revoke the HERS Program for Field Verification and Diagnostic Testing. The 23-HERS-01 Has made it very difficult to sell equipment. This leaves the low-income homeowners with very old and inefficient heating and cooling equipment given the cost of duct testing and refringent testing making the total cost a deal beaker We charge the apartments \$3200. For a condenser replacement. The added cost for the HERS test are as follows: seal register boots \$240 seal the indoor unit and coil \$340 (sealing just means taping up so it passes HERS Test) if it has leaks it still leak into the space at no loss of cooling. More cost Duct rater \$350 to \$450 depending on the area. We also charge an added \$200 to meet with the rater and be on site in case something is needed. Up to \$1200 extra cost just to test the system then find a loophole to pass it any how	Comments acknowledged and accepted. The Energy Commission is not revoking the HERS program at this time. The Energy Commission is sensitive to any impacts the HERS program has on lower income consumers. However, this rulemaking will not make any substantive changes to the HERS testing process or, as an extension, to the associated costs. The HERS Program is a way to ensure that the various features of a home meet the Energy Code requirements and achieve energy and cost savings for the consumer. Staff has concluded that the record does not support revoking the HERS program.
249214	Jasmina Dizdarevic Scheduler Energuy 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249215</u>	Rick Cowperthwaite President/CEO Rick's Energy Solutions, Inc. 03/16/2023 45-Day Comment	Summary of Comment: 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. Any disruption in the HERS Rating program would be devasting to the local building department enforcement of the Energy Standards.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249216</u>	Telly D Vinci Permit Pullers 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249217	C McClure CEO Quality, skill & Pride 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249218	Sharon Block Director of Sustainability Bright Green Strategies, Inc. 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249219	Tim O'neil Rater Quality Built 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249220	S K S K 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249221	CHRISTINE LAMOTHE Registry Setup Coordinator ARCXIS 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249222	JESSICA SMITH Registry and Reporting Analyst ARCXIS 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249223</u>	Francisco Muratalla 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249224	Will Guo 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249225</u>	Katie Myers Innovative Energy Solutions LLC 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249226</u>	Jordan Zerbini 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249227</u>	Silvia Almazan Office Manager Lovotti Inc 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249228	David Heatherly Senior Facilities Consultant Lane Consulting Services, LLC 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249229	Debora Gloria HERS Rater & Architect 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249230</u>	Dave Slama A-1 Duct Rating IDST Energy Consulting 03/16/2023 45-Day Comment	Summary of Comment: 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. Local jurisdictions and builders are already incorrectly acting as though the HERS regulations are repealed which opens them to potential lawsuits for noncompliance with the energy code which makes it important to be clear that the HERS regulations are still in effect.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249231	Kelvin B 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249232	Kevin Joseph 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249233	Mike Torosyan 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249234	Sara Sobenes Plus Air 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249235</u>	Gilbert Trimble Certified HERS rater/technician Quality Built 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249258	BRYAN OLSEN Regional Operations Executive (Field) ARCXIS 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249259	Eldan Crowder 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249260	Akintunde Bamiduro 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249261</u>	Energy Specialist 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249262	Mike Roeder Vintage Home Design 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249263</u>	David Nelson 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249264</u>	Peter Lujan 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249265</u>	Michael Olson 03/16/2023 45-Day Comment	As I understand it, this is a reorganization between Title 20 and Title 24. The CEC is trying to streamline HERS residential inspection process. The CEC is considering moving HERS residential from the "Whole House Efficiency" ratings Title 20 to Title 24. The CEC is not proposing to remove HERS residential inspections, but to remove the duplication of HERS inspections in both Title 20 and Title 24.	Comments acknowledged and accepted. Your summary of the intent of Title 20 and Title 24 rulemakings is essentially correct.

TN#	Author	Comment	Response
<u>249266</u>	Abraham Loftis HERS Rater 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249267</u>	Robert Memoli HERS Rater Certified Energy Services 1 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249268</u>	Eric Kirk Builders Energy Services Builders Energy 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249269	Peter Waring HERS Rater Laney & Skyline College Energy faculty 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249270	Pete Disch One Person Company 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249272</u>	Sam Hiscock Accounting Manager Energuy 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249274</u>	Nicole Godina Scheduling & Inspections Manager Energy 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249275</u>	Kelly Donovan 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249276</u>	Harley Turner 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249277</u>	KEYRA SERRANO Code Compliance Analyst ARCXIS 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249278</u>	Debra Cline Controller Builder Services Network dba California Living & Energy 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249279	Alfonso R 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249280</u>	Jessica York Builder Services Network DBA California Living & Energy 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249281</u>	Ralph Coleman Western Air Systems Certification, Inc. 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249282	Daria Young 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249283	Stefanie Forhan 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249284	Jason Solarez 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249285</u>	Zoraida Maldonado 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249286</u>	Jacob Loredo Plus Air Duct Testing Professionals 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249287</u>	Joseph Reaza Plus Air Duct Testing Professionals 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249288</u>	Diane Vessels California Energy Consultants 03/16/2023 45-Day Comment	Summary of Comment: 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. The commenter wanted CEC to combine the title 20 and title 24 rulemakings.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities. The CEC has discussed the proposed rulemaking process for Title 20 and Title 24 with the Office of Administrative Law and determined that the best course of action is the one proposed.
<u>249289</u>	Diego Garcia 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249290	Maria Ruiz 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249291</u>	Sara Hummel 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249292	Jim Taylor Owner AIR-TITE Duct Testing 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249293	Dan Ochipinti Former HERS I and II Rater BPI Building Analyst 03/16/2023 45-Day Comment	Summary of Comment: 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. Commenter also asked to retain HERS in the next building code cycle.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249294	Dennis Meredith CalCERTS Certified Rater CHEERS Certified Rater BPI Building Analyst ELITE Duct Testing 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249295	Roy Mittleider Director of Training CalCERTS, Inc. 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249296	Crystal A. Carbaugh ARCXIS 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249297	Jose Nuno CEO Mr. Title 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249298	Michael P. McDermott P.E. LEED AP The McDermott Group Valley Energy Consultants McDrone Aerial Imaging Services 03/16/2023 45-Day Comment	Summary of Comment: 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. The commenter wanted CEC to combine the title 20 and title 24 rulemakings.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities. The CEC has discussed the proposed rulemaking process for Title 20 and Title 24 with the Office of Administrative Law and determined that the best course of action is the one proposed.
249299	Matt Koester Sustainability Associate Bright Green Strategies, Inc. 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249300</u>	Jayme Carden Maximum Performance Housing, Inc 03/16/2023 45-Day Comment	Summary of Comment: 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. The commenter wanted CEC to combine the title 20 and title 24 rulemakings.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities. The CEC has discussed the proposed rulemaking process for Title 20 and Title 24 with the Office of Administrative Law and determined that the best course of action is the one proposed.
<u>249301</u>	Stacie Bagnasco Director of Contractor Services Central Coast Energy Services 03/16/2023 45-Day Comment	Summary of Comment: 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. The commenter wanted CEC to combine the title 20 and title 24 rulemakings.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities. The CEC has discussed the proposed rulemaking process for Title 20 and Title 24 with the Office of Administrative Law and determined that the best course of action is the one proposed.

TN#	Author	Comment	Response
<u>249302</u>	Jason Samaniego President/Owner Plus Air 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249303</u>	Sara Rogers Registry Administrator Quality Built 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249304</u>	DeziRay Spence Registry Administrator Quality Built 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249305</u>	Stacie Bagnasco Director of Contractor Services Central Coast Energy Services 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249306</u>	Jayme Carden Maximum Performance Housing, Inc. 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249307</u>	Pete Kennedy Senior Project Manager Bright Green Strategies, Inc. 03/16/2023 45-Day Comment	I wholeheartedly support the intent of the HERS program. Measurement & Verification is critical. However, the current Calcerts/CHEERS ecosystem is broken, and needs to be reworked. I spent years of my life working on meaningless registry data entry to help clients get their rebate checks in jurisdictions where the Chief Building Official couldn't care less about enforcing the energy code. What a waste of time. Also: QII!!! (need I say more) I've been a HERS Rater for 12 years, and it's the worst. I'm not sure what the best answer is here, but we need to stop doing what we are doing now. I encourage a new system with an absolute minimum of data entry. Architects and Mechanical engineers have professional licenses and sign off on major items in buildings with a simple letter and signature. I don't understand why HERS Raters can't do the same. I don't think the current system is fixable, unfortunately. It needs to go so we can have something better.	Comments acknowledged and accepted. The changes being proposed for Title 20 HERS regulations are intended to separate the HERS Whole House and FV&DT programs. The issues you are raising with your comments are being considered in the Title 24 FV&DT rulemaking (separate from this one). Staff encourages the commenter to participate in the Title 24 rulemaking proceedings; please refer to Docket number 22-BTSD-03.

TN#	Author	Comment	Response
249308	Lexine Lilly Builder Services Network dba California Living & Energy 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249309	Kaitlyn Hodgson 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249310</u>	Alfredo Baccari Principal ELEM3NTS 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249311</u>	Josh Feenan CalCERTS Certified HERS Rater Allied HERS Testing 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249312	LORENA PICHARDO Registry & Reporting Manager ARCXIS 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249313	Shelby Pettus Calif Living 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249314</u>	LAURA OLDAR Registry & Reporting Analyst ARCXIS 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249316</u>	Daniel Teka 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249317	Shawn Masterson COO Nor Cal Mechanical LLC 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249318	Diane Vessels California Energy Consultants 03/16/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249319	Debora Gloria HERS Rater & Architect 03/17/2023 45-Day Comment	Summary of Comment: 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. The commenter wanted CEC to combine the title 20 and title 24 rulemakings.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities. The CEC has discussed the proposed rulemaking process for Title 20 and Title 24 with the Office of Administrative Law and determined that the best course of action is the one proposed.
249320	Rick Yim Owner Advanced Energy Conservation, LLC 03/17/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249321</u>	NICOLE ALEMAN Registry and Reporting Analyst ARCXIS 03/17/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249322</u>	Henrik Merikyan Accu-Raters 03/17/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249323</u>	Jim Apostolos 03/17/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249324	Ricardo Rodriguez 03/17/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249325</u>	NELSON FAGELA Certified HERS Rater ARCXIS 03/17/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249326	S.M. 03/17/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249327</u>	Stefanie Forhan 03/17/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249328	Stephanie Flournoy 03/17/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249329	Avery Ray Colter CABEC Certified Energy Analyst Residential & Nonresidential CalCERTS Rater Residential & Nonresidential LEED-NC BD&C AP Fard Engineers 03/17/2023 45-Day Comment	I have been reading my emails, and the published reasons for this change. At this point, my question is, what activities are envisioned to differ between the Whole House HERS rating and the FV & DT? If the activities of Whole House HERS Raters and "Verifier/Testers" (or whatever term is contemplated) are largely identical but for a few items, will there be provisions for HERS Raters to transition to both professional certifications given training in such differences? I sense there is a desire among many to know if there is a more concrete vision of how this FV & DT role directly in Title 24 is to be implemented before we go over this cliff of having those trained for the role as defined in Title 20 not knowing if they are to be construed as qualified to perform the role as defined directly in Title 24. I hope to hear more at the March 28 th presentation.	Comments acknowledged and accepted. In answer to each question: • The whole house raters will be governed in Title 20, while the FV&DT raters will be governed in Title 24. • Yes, current raters are and will be able to act as whole house and FV&DT raters.
<u>249335</u>	Ted Phifer 03/17/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249356</u>	Jerad Lafond Owner Duct Doctors HERS Testing and Permits 03/20/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249357	Jim Apperson Apperson Energy Management 03/20/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249358	David Campbell 03/20/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249359	Zachary Obray Permit Tech Admin Energuy 03/20/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249360</u>	Chris Barriere HERS Rater Barriere Energy 03/20/2023 45-Day Comment	 Summary of Comment: No notice that the program will be suspended or terminated – Fully SEPARATE proceeding with separate docket. The State of California does not repeal Public Safety Laws. This proceeding will actually strengthen the requirements, adding TEETH to the Laws. The T24 Proceedings should be geared toward simplification Energy Efficiency is a Public Safety Issue. HERS, MATT, EATT, and now CABEC T24 should be administered by CSLB (not Providers) The HERS rater is tasked with a large number of inspection line items. Any significant changes we make now are going to drive up prices to consumers. 	Thank you for your comments. These comments are in basic support of the Title 20 and Title 24 rulemakings. Staff encourages commenter to participate in the Title 24 rulemaking proceedings; please refer to Docket number 22-BTSD-03. The Energy Commission has considered (with CSLB) shifting the oversight of HERS Rates to CSLB. Such a substantial change would be well beyond the scope of either the Title 20 rulemaking or the Title 24 rulemaking.
<u>249368</u>	Sarah Souza 03/20/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249369</u>	Bing Guerin Program Director DNV Energy Services USA Inc 03/20/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249370	Matt Ernst Central Valley Duct Testing 03/20/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249371</u>	Matt Ernst Central Valley Duct Testing 03/20/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249373</u>	Ethan Fellersen Design Engineer, HERS Rater Optimized Energy & Facilities Consulting, Inc. 03/20/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249377	Kevin P. Gilleran President Gilleran Energy Management, Inc. 03/21/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249380	Ramon Rendon CEA ENERCAL 03/21/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249435</u>	Giovanni Ceciro CEO Energy Liberty Corporation 03/27/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249436</u>	Giovanni Ceciro CEO Energy Liberty Corporation 03/27/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249437	CASSANDRA TRESTER Sr. Account Executive and Consultant – California ARCXIS 03/27/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249439	Allen Scoging 03/27/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249440	Elio Adame E&S Duct Testing L.L.C 03/27/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249441	Johanna Stutz Energy Liberty Corporation 03/27/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249446</u>	Mauricio Morales Title 24 Technical Specialist CalCERTS, Inc. 03/27/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249447	Roy Mittleider Director of Training CalCERTS, Inc. 03/27/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249448	Tamara Dias Special Projects Manager CalCERTS, Inc. 03/27/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249451	ADAM BERGMANN Adam Bergmann FCCS Inc 03/28/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249452</u>	Casandra Dentley Director of Client Services CalCERTS, Inc. 03/28/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249454</u>	Paul A. Dunn CalCERTS Rater #CC2005798 Central Coast Energy Compliance 03/28/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249455</u>	Chris Johnson Owner Kern Energy Raters 03/28/2023 45-Day Comment	Summary of Comment: 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. The Business Impact Analysis was incorrect.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities. The impacts to business are estimated based on documented assumptions.
<u>249456</u>	Francis S. Villapando Title 24 Technical Specialist CalCERTS, Inc. 03/28/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
249457	Kevin P. Gilleran President Gilleran Energy Management, Inc. 03/28/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
249458	Jeremiah Ellis 03/28/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249459</u>	Jay Jones Jones Energy Solutions 03/28/2023 45-Day Comment	Summary of Comment: 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. CEC needs to make the HERS program more stringent.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249460</u>	Justin Beranich 03/28/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249462</u>	Lynne Mitschke 03/28/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249463</u>	Adrian Osgood Delta T Energy Consulting 03/28/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249464</u>	Wayne Alldredge Director of Energy Services VCA Green Orange 03/28/2023 Hearing – Docket	Summary of Comment: I believe the same triggering philosophy (used to implement the mechanical ATTCP program) needs to be designed into this HERS into FV&DT transition. The code section can be written, the requirements can be defined, but if the revocation of Title 20 HERS language is triggered by the official activation of new Title 24 FV&DT language (regardless of the date that happens), then there is no gap in testing requirements and the benefits this testing provides to owners, occupants, and our energy infrastructure.	Comments acknowledged and accepted. The Energy Commission published 15-day language to have the effectiveness of this Title 20 rulemaking be triggered by the effectiveness of the Title 24 Energy Code rulemaking, as recommended by this comment.

TN#	Author	Comment	Response
<u>249465</u>	Justus George Delta T Energy Consulting 03/28/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
<u>249466</u>	David Choo Director of Compliance CalCERTS, Inc. 03/28/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.

TN#	Author	Comment	Response
<u>249493</u>	Patrick Schlosser 03/29/2023 45-Day Comment	Summary of Comment: 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.	Comments acknowledged and accepted. Changes to the regulatory language was done in the 15-day language to clarify that the Energy Commission is not revoking the HERS Program. Certain administrative aspects of the HERS program are being removed from Title 20 because they are being adopted, or already exist, in the Title 24 Energy Code. The adoption of corresponding provisions in Title 24 will become effective at the same time as their removal from Title 20 so as to avoid any gap in regulation for the HERS program. This action will have no regulatory or practical impact on the HERS program or any regulated entities.
	David Choo 03/28/2023 Hearing – Chat	Will the costs of the Title 24 rules be factored into the Title 20 rulemaking?	Comment acknowledged and accepted. Any potential costs associated with the proposed changes to the new field verification and diagnostic testing program regulations in Title 24 will be addressed in the 2025 Building Energy Efficiency Standards rulemaking.
	Garrett 03/28/2023 Hearing – Chat	If the purpose of this is to make homes and HVAC systems more efficient, is there any plan to enforce permit pulling by all contractors on all installations?	Comment acknowledged and accepted. There are pending legislative proposals that may address this issue. However, this issue is outside the scope of the Title 20 HERS Rulemaking.
	Gina Lombardo 03/28/2023 Hearing – Chat	Hello, can you define what 'voluntary' means in this context please?	In this context, voluntary refers to the HERS Whole House program. The HERS Whole House program is a voluntary program that homeowners may use to evaluate their buildings including recommendations for measures that can improve the home energy use.
	Giovanni Ceciro 03/28/2023 Hearing – Chat	NOTE: Giovanni Ceciro is erroneously referred to as Giovanni Sorrell in the March 28, 2023 Workshop transcript on page 25. Will current HERS Raters be the testers for FV&DT in the modified 2025 Title 24 diagnostic code?	Comment acknowledged and accepted. Yes, the HERS Rater role will not change as a result of the proposed changes in either the Title 20 or Title 24 rulemakings.

TN#	Author	Comment	Response
	Jeremiah Ellis 03/28/2023 Hearing - Chat	If this is an open discussion, How come the CEC cant answer Will Somco's question now?	Comment acknowledged and accepted. The procedures for a hearing differ from those of other public meetings. During a hearing, staff has limited ability to answer any question directly and will rely on the Response to Comments documents of the rulemaking process.
	Jeremiah Ellis 03/28/2023 Hearing - Chat	There are a lot promises that the CEC are making that these are working in tandem, but of the T20 is voted and approved before T24 is voted and in place means the industry has to entrust in the CEC will get T24 proceedings getting done on time, or have their livelihood threatened because the code has been stricken out before it was added back into T24. The commission has a history of not getting T24 regulations fully developed in time, so trust in that is very low across the industry. The current LRMF issues and the previous 6 month delay of the 2013 implementation are key concerns.	Comment acknowledged and accepted. The CEC published 15-day language to clarify the intent and effect of this rulemaking and ensuring that this rulemaking will not become effective until the date the Title 24 rulemaking becomes effective, therefore removing any possibility of a regulatory gap.
	Jeremiah Ellis 03/28/2023 Hearing - Chat	Delaying the approval to wait until T24 docket is finalized would assure the industry that the CEC is listening and hearing the concerns. Can the CEC provide any other benefits to pushing this through approval so fast and before the T24 proceedings are in finalized?	Comment acknowledged and accepted. The CEC published 15-day language to clarify the intent and effect of this rulemaking and ensuring that this rulemaking will not become effective until the date the Title 24 rulemaking becomes effective, therefore removing any possibility of a regulatory gap.
	Karen Zamarippa 03/28/2023 Hearing - Chat	Does not have any concerns. Prefer longer timeline. Ample opportunity to discuss proposed changes. Look forward to working with CEC. Urges to slow down the process.	Comment acknowledged and accepted. The Title 24 FV&DT rulemaking, where the substantive changes are made, is in its pre-rulemaking phase. As such, there is ample time and opportunity to discuss the proposed changes in the Title 24 rulemaking. Staff encourages commenter to participate in the Title 24 rulemaking proceedings; please refer to Docket number 22-BTSD-03.
	Paul Valenzuela 03/28/2023 Hearing - Chat	I thought they will they will answer these questions	Comment acknowledged and accepted. The procedures for a hearing differ from those of other public meetings. During a hearing, staff has limited ability to answer any question directly and will rely on the Response to Comments documents of the rulemaking process.

TN#	Author	Comment	Response
	Peter Waring 03/28/2023 Hearing - Chat	Avenue to education	Comment acknowledged and accepted.
	Peter Waring 03/28/2023 Hearing - Chat	Encourage to refine the standards for constructions and let's not give up	Comment acknowledged and accepted.
	Richard Barlow 03/28/2023 Hearing - Chat	Has the CEC discussed a plan to educate builders, inspectors and subcontractors moving forward instead of the raters educating the parties mentioned after the construction process	Comment acknowledged and accepted. The CEC is always considering alternative outreach efforts for builders, inspectors, and contractors.
	Shane Vercuysse 03/28/2023 Hearing - Chat	who started this process?	Comment acknowledged and accepted. This process was initiated by the CEC through an Order Instituting Rulemaking, which was adopted on May 11, 2022.
	Will Simco 03/28/2023 Hearing - Chat	Why can't the CEC finalize the changes to the FV&DT program, and adopt that program into Title 24, before revoking the HERS program from Title 20?	Comment acknowledged and accepted. The rationale to proceed with the Title 20 rulemaking ahead of the Title 24 rulemaking was to avoid having two regulations governing one industry.
	Shelby Gatlin 03/28/2023 Hearing - Verbal	Summary of Comment: We are concerned that the Commission is revoking the HERS Program from Title 20 before we understand the scope of changes to the Field Verification and Diagnostic Testing Program. Our request is simple. Have the Commission wait to proceed on this Title 20 rulemaking until the Title 24 program is finalized.	Comment acknowledged and accepted. The CEC published 15-day language to clarify the intent and effect of this rulemaking and ensure that this rulemaking will not become effective until the date the Title 24 rulemaking becomes effective, therefore removing any possibility of a regulatory gap.

TN#	Author	Comment	Response
	Peter Waring 03/28/2023 Hearing - Verbal	Summary of Comment: I really would like to encourage doing whatever we need to refine these actual demonstrable, scientifically measurable standards for construction, but let's not drop them. Let's not give up what I found to be the main avenue for education in the industry.	Comment acknowledged and accepted.
	Karen Zamarippa 03/28/2023 Hearing - Verbal	Summary of Comment: Concerned about timing of the removal of the current regulations from Title 20 to Title 24 Asking for more time to work with the CEC regarding the proposed changes in the Title 24 regulations.	Comment acknowledged and accepted. The Title 24 FV&DT rulemaking is in its pre-rulemaking phase. As such, there is ample time and opportunity to discuss the proposed changes in the Title 24 rulemaking. Staff encourages commenter to participate in the Title 24 rulemaking proceedings; please refer to Docket number 22-BTSD-03.
	Peter Waring 03/28/2023 Hearing - Verbal	Summary of Comment: Does not support restricting payment of HERS Raters to homeowners only. Would like to see more ways in which the Rater and Contractor can interact.	Comment acknowledged and accepted. This comment is out of scope for the Title 20 HERS rulemaking but will be considered in the Title 24 FV&DT rulemaking. Staff encourages commenter to participate in the Title 24 rulemaking proceedings; please refer to Docket number 22-BTSD-03.
<u>250583</u>	Russel King CEO Coded Energy, Inc. 06/09/2023 15-Day Comment	Summary of Comment: The designation as a special inspector was put into the code because that's exactly the role they serve. I believe that HERS raters do meet the definition of a special inspector as stated in Title 24, Part 2. The "approved agency" is the HERS Provider. I strongly believe that local building departments need the authority to determine whether raters are allowed to perform FV&DT in their jurisdiction. There may be reasons other than HERS competency that a building department needs to stop a HERS rater from working in their jurisdiction, such as business license, and violations not related to HERS inspections, etc.	Mr. King accidently filed this comment in the wrong docket. The comment concerns a separate rulemaking effort in Title 24. Mr. King agreed that it was an error and voluntarily refiled the comment in the appropriate docket.