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**CHEERS summary of Express Terms and Appendices sections for review**

Due to login issues, I'm submitting the attached for CEC review. CHEERS requests a workshop with the CEC and the other certified Provider to review and collaborate on the various sections impacting the CA HERS industry.

*Additional submitted attachment is included below.*

# 2025 Standards and RA Express Terms Review

## Standards

10-103.3(b)1Avi – Report delivered to building owner. Raters and Rater Companies need to be aware.

10-103.3(b)1Avii – Consent Letter. Raters and Rater Companies need to be aware.

10-103.3(b)1Aviiib – Lock failed project to prevent registration of documents by a different Rater.

10-103.3(b)1Aviiic – Accept failed project registered in a different registry.

10-103.3(b)1B – Conflicted Data. This section as a whole is a solution looking for a problem.

10-103.3(b)1B – Refused access to sampled project results in conflicted data. Raters and Rater Companies need to be aware.

10-103.3(d)5B – Minor issue - Verified Rater – Language still includes non-QII shadow audit and in-lab audit as neither is defined.

10-103.3(d)5C – Minor issue - Heading still includes in-lab audit, needs to be removed.

10-103.3(d)5Cif – Onsite audit for untested sampled homes. Suggest the CEC should conduct a study outside of the Providers QA program to assess the viability of the sampling program.

10-103.3(d)5Cig – Rater held accountable for developers’ denial of access. The CEC should apply the requirement to the developer with its own set of consequences.

10-103.3(d)5Ciia – Shadow audit notification.

10-103.3(d)5Ciid – Shadow audit checklist – unable to locate the checklist in RA3.5.

10-103.3(d)5Civa – Maximum variance – The CEC should determine a maximum variance for consistency between Providers QA programs.

10-103.3(d)5Dii,iii,iv – Remedy for failed QA – Response noted in CalCERTS email

10-103.3(d)8 – Rater Company Discipline – The CEC needs to provide examples of how a Rater Company would violate the regulations.

10-103.3(d)10B – Data access – The issues with this requirement were presented to CEC staff during the in office meeting with both providers.

10-103.3(d)11G – Annual Reporting – Several issues with data that Rater Companies are required to submit to the Provider and then to the CEC.

10-103.3(d)15 – Provider Discipline – “failure to allow the Commission full access to the ECC-Provider data registry (Section 10-103.3(d)12)”. Full access needs to be clearly defined as this is likely problematic.

10-103.3(d)15 – Provider Discipline – “A severe violation of these regulations includes knowingly creating false field verification or diagnostic testing documents”. Providers don’t create FVDT documents, this language should be removed.

10-103.3(f)2B,C – Document access for Rater Company – Limits access to CF3R to the Rater specifically.

10-103.3(f)2G – Rater Company Responsibility – Need definition of a violation/s by a Rater that would result in disciplinary action for the Rater Company.

10-103.3(f)2I,J – Rater Company providing data/results – This appears to be a copy/paste from the Rater section and does not directly apply to the Rater company. Needs to be clarified or removed.

## Reference Appendices

JA7.5.6.3 Photographic Documentation for Registered Documents – This language only covers “if” a photograph is uploaded. I think we have the support to push for this to become a mandate.

RA3.2 – Changes to the weigh-in procedure for both contractor and Rater.

RA3.2.3.3 – Note to CEC, this section is missing.

NA2.1 – Nonres duct leakage – Completely removed. Not sure why. Now the responsibility of ATT’s?? See NA7.5.3.