

August 22, 2008

Helen Lam  
California Energy Commission  
Buildings and Appliances Office  
1516 Ninth Street, MS-25  
Sacramento, CA 95814-5512

<b>DOCKET</b>	
08-HERS-1	
DATE	AUG 22 2008
RECD.	AUG 26 2008

**RE: California Home Energy Rating System Program-Docket Number 08-HERS-1**

Dear Commissioners,

CalHERS represents the independent 3rd party Raters profession in California. We involve, educate develop and support Raters as a professionals to "raise the bar" in terms of ethics, accountability, and competence. We develop the Rating Profession by working with other stakeholders to make energy efficiency programs simple, clear, affordable, credible, achieve real energy savings, and protect the consumer.

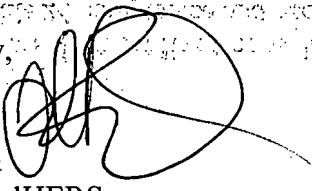
HERS Raters are the front line troops, indeed, the face of the California Energy Commission. HERS Raters do the legwork of Title 24 compliance and because of this; we offer valuable real-world perspectives that others may not have.

Our membership is comprised of HERS Raters from CHEERS, CalCERTS, and CBPCA representing large and small companies. Our members are motivated to see that the HERS profession in California is elevated and that policies and programs that directly affect HERS raters include opinions from our CalHERS members.

We are excited about the proposed HERS Phase II Regulations and we look forward to the Raters' expanded role in the existing home market. We believe that regulating the existing housing stock is critical to achieving the state's long term energy efficiency goals, including AB32 and the 2009 Strategic Energy Efficiency Plan, as well as others.

As independent 3rd party Raters we believe that allowing Building Performance Contractors (BPCs) to perform HERS Ratings on their own projects undermines the conflict of interest rules that have been in place since 1999 with the adoption of the HERS Regulations. We also believe it is not in the BPCs best interest, and may create confusion in the marketplace and could even invite abuse.

Respectfully,

  
John Richau  
President, CalHERS

CC: **CalHers Board**  
Joe LoConte  
Debbie Thompson  
Tommy Young  
Dave Hegarty  
Ed Sandoval  
Bill Lilly