

ENERGY INSPECTORS

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Information Proceeding to Improve the HERS Program
Docket office, MS-4
12-HERS-1
HERS OII



1. Require a second 2nd HERS Provider is approved by the CEC and is operating at full capacity and carrying out the same scope of work as the other provider for new homes, existing homes and retrofits.
2. Need a process allowing for the full, uncomplicated and cost-free transfer of all project types (including those of utilities) between providers at any time. This is critical to insure pricing is the result of free-market forces and not captive to one provider without the ability to transfer a project.
3. A pricing review process established by which the CEC will be required to approve all pricing increases requested by the providers, including, but not limited to, a public review and comment period.
4. No entity involved in the registry process will be charged for another entities' uploads, unless a formal approval process is completed between the provider and the entity assigning their payment responsibility and the entity accepting their payment responsibility. The raters frequently find themselves acting as a collection agency on behalf of the provider for services previously provided by a different rater. This responsibility for this must lie with the provider.
5. Price increases will only be imposed on new projects (CF-1R uploads forward). All existing projects (having a CF-1R in the registry) should be held to the current pricing structure. Again, raters cannot be placed in the position of either passing on, or absorbing, increases imposed in midstream by a provider who has a monopoly over the California rating industry. The CEC must exercise final control over HERS pricing structures.
6. A single training and certification curriculum for HERS Raters that qualifies the HERS Rater to work with any HERS Provider approved by the CEC. If training programs has been approved by the CEC for one provider, it should be adequate for another California provider without the need for additional, unnecessary and expensive re-training.
7. A comprehensive, objective and most of all, fair, program of quality control and rater evaluation must be implemented. It is imperative that no rater is subject to disciplinary action, up to and including, suspension on the basis of anything that is even remotely

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arbitrary. By the same token, there must be safeguards in place to prevent a rater who was legitimately de-certified from going to work for a competitor.

8. Allowing for Rater Companies to assist in providing own QA as means of reducing costs to Providers. Rater Companies could provide quarterly reports on QA of raters in their companies to the Provider
9. Rater Companies need notification of a rater's performance when QA occurs. The Provider is the training & certifying body for raters, and Rating Companies rely on the Provider to ensure that the rater is in good standing. Providers need to contact the "rater company" if a rater has failed any home inspections or tests. It is critical that this information be provided to the Rater Company in a timely manner in order to address the issue's and provide "corrective measures" in the field.
10. Recommend the creation of a HERS Oversight Committee. An oversight committee would be effective in working out issues between Raters and Providers.