

## Energy - Docket Optical System

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**From:** Spencer Rosen [jsr@energyintegrity.net]  
**Sent:** Saturday, November 09, 2013 11:34 PM  
**To:** Energy - Docket Optical System  
**Subject:** 12-HERS-1 and HERS OII

**Categories:** Ready to Docket



Thank you for the opportunity to comment on these specific HERS topics. I would speak them over the phone but will be in the ACI Regional Conference in San Diego during the time of this opportunity.

### 1) HERS II Building Performance Contractor QA Surcharge

HERS II BPCs are charged a \$25 QA Surcharge (5x the surcharge for non-BPC QA) in addition to the \$28 Base Fee and \$10 Energy Pro Fee to submit a HERS II rating. The distinction on whether a project is to be submitted as a BPC is currently placed in the CalCERTS portal at "Test-In." At "Test-In" a HERS II BPC does not necessarily know whether the customer will proceed with contracting services with that HERS II BPC and therefore an elevated QA Surcharge is unnecessary and in-appropriate. We recommend and request this surcharge is only assessed and assigned for BPC's at the test-out or after work has been completed. As a BPC we perform many HERS II ratings and we assert it is not appropriate to have to pay the BPC QA surcharge on every HERS II rating we perform. We understand that additional QA may be required for work performed under our BPC designation and request that the fee schedule reflects that QA intention.

### 2) Non-Signature Availability

We've been informed that proceeding in 2014 providing signature authority for HERS raters to process CF1R's in the registry will no longer be available. As HERS raters we provide a very technical and specific service to installers and contractors that assists them verify the integrity of their work and focus on their core services. We also honor and respect CalCERTS clear instructions to not share and use registry passwords from other users. The signature agreement allows Raters to provide a full service for installers and contractors with integrity while minimizing installers and contractor's administrative involvement. Only a small portion of the HVAC retrofits are permitted in the State of California. We are HERS raters that intend on working with and enabling contractors and installers to move forward the path to permit compliance and want to make this process as simple and easy as possible. Requesting their participating in a new and unfamiliar portal is adding another step and hoop to contractor and installer compliance. We request this change is reconsidered.

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Should there be any additional questions regarding these comments from the CEC or any other agency we will happily discuss either of these two issues further to support the industry moving forward.

Thank you!

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