

Draft PDS-01.2 Addendum 67

Chapter 1 Update

This proposal is being issued on behalf of the Standards Committee of the Northeast Home Energy Rating System Alliance, which represents more than 260 Raters and 11 Providers from New Jersey to Maine.

See comments below in green.

102.1.1.1.3.1.1 Rating Providers must use the RESNET QA application to complete all QA reviews (File and Field);. OR

102.1.1.1.3.1.2 Rating Providers must receive prior written approval from RESNET of any alternative formats in the current version of the QA Review Checklist before any alternative formats can be used for QA Reviews.

Recommendation: Mandatory compliance should not be required until all QA documents (EPA, DOE, etc.) and QA types (pre-drywall, etc.) are available within the application & registry, and proof of concept has been established. Suggested mandatory compliance date 1/1/2026 or when the application has been proven to work without complications if after that date. Current feedback from users is there are several glitches that are causing issues in the registry. Also, the registry does not currently include pre-drywall, ENERGY STAR, IAP, and ZERH required checklists.

102.1.1.2 - The Rating QA Provider shall maintain a full video recording of all Remote QA reviews performed by Quality Assurance Designees for a period of at least three years and be made available to RESNET upon request.

Recommendation: Challenges with this proposed change are maintaining available storage space for storing data, additional challenges are operating system compatibility, conversion to format that can be viewed across devices. Recommend that RESNET provides storage capabilities within the registry or have a recording button within the application (see above for feedback on the application itself).

102.1.10 Ensure Certified HERS Raters utilizing HERS Modelers and/or RFIs maintain sufficient personal involvement in modeling and field data collection supervision and review, to certify their knowledge that the resulting HERS, HERS_{H20}, or CO_{2e} Ratings meet the standards of the profession. Rating Quality Assurance Providers and Certified HERS Raters shall not allow the Certified HERS Rater's ID to be affixed to any HERS, HERS_{H20}, or CO_{2e} Rating not reviewed by the Certified HERS Rater or prepared under the Certified HERS Rater's supervisory control. Rating Quality Assurance Providers shall not perform any substantive alteration to and re-register a previously uploaded HERS, HERS_{H20}, or CO_{2e} Rating that would have a calculation impact on that HERS, HERS_{H20}, or CO_{2e} Rating or any calculation impacts that would change the compliance status of the other compliance methods outlined in Section 101.1 - Purpose without either first conducting a new on-site field inspection through a certified Quality Assurance Designee under their Providership during the course of Field QA or obtaining affirmative agreement or written consent to do so from the original Certified HERS Rater. The original Certified HERS Rater's Rating Quality Assurance Provider, with access to the original Certified HERS Rater's

work, or a different Rating Quality Assurance Provider or another Certified HERS Rater (who is not the original Certified HERS Rater) that somehow obtains the original Certified HERS Rater's work may not use any of that original Certified HERS Rater's work to reverse engineer and generate a new Rating on the same address where the construction has progressed past the point where verification of specific minimum rated features would not be possible in accordance with the RESNET standards except in scenarios outlined and approved in the RESNET Policy on Transferring Rater of Record. All other instances of a Rating Quality Assurance Provider or another Certified HERS Rater (who is not the original Certified HERS Rater) attempting to modify an existing HERS,- HERS_{H20}, or CO_{2e} Rating or reverse engineer and generate a new HERS, HERS_{H20}, or CO_{2e} Rating on the same address using the original Certified HERS Rater work is expressly prohibited.

Add Language: "Unless the original rater of record has authorized the transfer of the file for use"

102.1.13 Carry a minimum of one million dollars in professional liability insurance coverage and provide RESNET certificates of the insurance coverage.

Does this also include E&O coverage? This should be a policy determined at the provider level, if at all. Legal considerations regarding liability and other insurances should be between the owner/operator of the rating company and the local authority having jurisdiction. Recommend removing this language.

102.2.9.2.1.1 A HERS Rater may elect to provide advance disclosure directly to a home builder or EEP using the RESNET "Home Energy Rating Standard Disclosure" (Standard Disclosure) form for each home that receives a home energy rating as required by that home builder or EEP, or as desired by the HERS Rater.

102.2.9.2.1.2 In the event a HERS Rating is being contracted directly by a homeowner on their property, a HERS Rater must provide advance disclosure to the homeowner using the RESNET "Home Energy Rating Standard Disclosure" (Standard Disclosure) form for each home that receives a home energy rating.

Additional Language: The HERS Rater must include the RESNET Standard Disclosure form as part of QA (file/field) unless noted in the building model that the rater is not directly working on behalf of the homeowner and no disclosure has been made. Or, do not require submission of the RESNET Standard Disclosure form to meet QA requirements.

102.2.9.3.4 The Provider shall provide written notification ~~shall inform to RESNET of the Certified HERS Rater/RFI/HERS Modeler of their right to appeal under Section 911 of these Standards;102.2.9.3.2.6.2 After the allowable period of time for appeal, and/or an unsuccessful appeal of suspension, notification of suspension to RESNET through the National RESNET Registry within five (5) business days of the date of suspension, known Certified HERS Rater's clients (i.e. builders or other organizations with repeat business with a Certified HERS Rater or Rating Company), to EPA or other known EEP's;~~

Recommendation (on above) – Once the provider has changed the rater's status in the registry, this becomes publicly available via the Rater Verification. EEPs can check participating rater statuses. Since HERS Raters are not allowed to register ratings while suspended, this is effectively a non-issue.

Recommend striking the above change in language in section 102.2.9.3.4.

o102.2.9.3.4.49 The Provider shall provide ~~W~~written notification to Rating **Clients and known EEPs** for whom projects were submitted to the RESNET Registry within the last calendar year by the Rater in

~~question that the Certified HERS Rater/RFI/HERS Modeler -which includes the cause for revocation and explanation of notifications to third parties of the Certified HERS Rater's/RFI's/HERS Modelers ability to complete, submit or acquire any new rating projects or new rating business recognized by any RESNET Accredited Rating Quality Assurance Provider has been revoked as of the date of revocation. ~~Written~~~~

Strike language above 102.2.9.3.4.19

~~106.2 When working with EEP's, Certified HERS Raters may be required to perform tests, inspections, verifications and reporting that require skills related to energy efficiency not specific to Home Energy Ratings as defined in these Standards and/or are required to become a Certified HERS Rater. However, it is the responsibility of Certified HERS Raters to perform all of the stipulated tests, inspections, verifications and reporting related to energy efficiency required by the EEP when agreeing to work with their program, including proper completion of any and all checklists, certificates, or other documentation. Where a Certified HERS Rater/RFI/HERS Modeler does not possess the proper skill or knowledge of a particular test, inspection, verification or reporting requirement, they shall be responsible for obtaining sufficient training from the EEP, or trainer approved by the EEP, to properly fulfill the requirement. An exception may be made in cases where portions of an EEP's testing, inspection, verification or reporting process are completed by another company or individual who holds the required training or certifications.~~

To avoid liability concerns, RESNET should expand training requirements and limit rater's access to (electrical, etc.) if they do not hold the proper credentials (electrician, etc.) We should encourage the allowance for raters to shadow the HVAC contractor during system commissioning to collect data. Or, allow the contractor to provide commissioning reports that meet the data entry requirements via a software generated commissioning report (e.g. Testo app., MeasureQuick, etc.)