COMMENT #3

**Amendment:** Proposed MINHERS Addendum 50, HERS Modeler, Draft PDS-01  
**Page Number:** 14-15  
**Paragraph / Figure / Table / Note:** 208.2  
**Comment Intent:** Not an Objection  
**Comment Type:** General  
  
**Comment:**

? ***Can the SDC 200 committee state that employing a certified modeler is optional or not required for rating companies? As:***

• Reflected in the RESNET accredited provider structure of comprehensive file and field review for Quality Assurance, the basic role of a certified rater is to be fully responsible for the accuracy of all inputs in a RESNET HERS energy model, thus eliminating ***need*** for a certified modeler. The ***option*** of retaining a certified modeler would be the decision of the rating company.

• Some rating companies currently employ non credentialed personnel to pre-flight and originate HERS energy models. Subsequently the certified rater on the rating vouches for and corroborates the accuracy of the inputs after his / her plans review, visual inspection, site visits, and testing. It appears Addendum 50 does not explicitly rule this existing arrangement out in the future. Please advise. Please state that this approach remains or does not remain allowable.

?***By default, current HERS raters are also allowable HERS energy modelers. There is no need for current HERS raters to earn this separate modeler credential as we read the language. Please advise or confirm.***

***? Those who earn the rater certification in future are automatically presumed to be sufficient in energy modeling, there is no need to earn a separate energy modeling credential when an individual is earning his / her rater certification in the future. Please advise or confirm.***

***? When a rating company is using a certified modeler, can that modeler be a sub-contractor or hired vender of energy modeling services, or does the modeler have to be in direct employment of the rating company? NEHERS supports the hired energy modeling vender path as a means to promote HERS business models. However we support:***

* The modeler must be associated w/ an accredited HERS provider.
* He is allowed access to the HERS energy modeling software only via the provider path

? ***NEHERS is concerned that an energy modeler w/ access to the rating software could deliver HERS rating report (electronic or paper) documentation to builders, code officers, developers and homeowners that has not been registered in the RESNET registry but presented as energy code compliance documentation anyway.***

* Will the criteria of this addendum allow the energy modeler to pass electronic or paper based documentation to clients w/out clearly stating the documentation is “Projected Rating Only – Not adequate for code compliance” or something to that effect?
* Should a certified HERS raters name / RTIN be associated for every dwelling address in any / all HERS energy models and subsequent documentation.
* Please consider if the energy modeler should be contracted only by a certified energy rater, a rating company aligned w/ an accredited HERS provider or a HERS provider directly. This intent being designed to prevent modelers from being contracted by builders, developers or others for rating documentation that isn’t uploaded to the RESNET registry or been made subject to RESNET HERS QA.

?***Members of the standards committee expressed remarks that the statement of the capabilities of a modeler and the training regimen that go into the training for the category / credential could use further development and definition.***

***? What would be the requirement for moving from certified modeler to certified rater? Would a full rater class and testing be required or would it be RFI class and testing, combined w/ the modeler credential, getting the full rater certification?***

***? Is the energy modeler subject to direct review of file QA via the providers QAD or only indirectly as a result of the file QA being conducted on the certified HERS rater that uses the certified energy modelers  models?***

COMMENT #4

**Amendment:** Proposed MINHERS Addendum 50, HERS Modeler, Draft PDS-01  
**Page Number:** 5  
**Paragraph / Figure / Table / Note:** 206.2.2  
**Comment Intent:** Objection  
**Comment Type:** Technical  
  
**Comment:**

• I have a type/ numbering correction to offer, Change the current language directly below:

• **206.2.2 HERS Modeler  
• 206.2.2.1 Pass the following RESNET Test:  
• 206.2.2.1.1 The RESNET HERS Modeler Practical Evaluation, as developed by RESNET and administered by a RESNET Training provider.  
• 206.2.2.1.1.1 The HERS Modeler shall pass a separate practical evaluation specific to each RESNET Accredited Software Tool for which they are seeking certification.**

**Proposed Change:**

• To this, directly below: See inserted type corrections and strikethroughs.

**• 206.2.2 HERS Modeler  
• 206.2.2.1 Pass the following RESNET Tests:  
• 206.2.2.1.1 The RESNET HERS Modeler Practical Evaluation, as developed by RESNET and administered by a RESNET Training Provider.  
• 206.2.2.1.2 ~~1.1 The HERS Modeler shall pass a~~ A separate practical evaluation specific to each RESNET Accredited Software Tool for which they are seeking certification.**