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California Title 24 - Heat Recovery Requirements

The current Title 24 requirements for heat recovery from a refrigeration system is not clear as how it applies to an existing facility that may or may not have new systems (HVAC and/or Refrigeration) added and or reused systems (HVAC and/or Refrigeration). The following scenario questions are in reference to section 120.6 - Refrigeration Heat Recovery.

Paragraph A

â€¢ Due to Exception 2, only new added equipment with individual THRâ€™s of 150MBH are required to provided heat recovery for space heating, correct?

Exception 2

â€¢ If no new refrigeration or new hvac equipment is added, does exception 2 apply?

â€¢ If new HVAC equipment is added, but no new refrigeration equipment is added, does exception 2 apply?

â€¢ If new refrigeration equipment is added, but no hvac equipment is added, does exception 2 apply?

o If exception 2 doesnâ€™t apply, it would then require modifications to existing to remain and unaltered HVAC equipment.

o Even if new HVAC equipment is added, the equipment could be so minor that 25% of the new refig equipmentâ€™s THR canâ€™t be utilized. Whatâ€™s the intent?

Exception 3

â€¢ Exception 3 only applies if all refrigeration systems (new and existing) with individual THRâ€™s ≥ 150 MBH has a combined THR > 500 MBH, correct?

o Scenario: If numerous condensing units were added to a building and each individual units THR was less than 150MBH and the total combined THR was greater than 5000MBH, would paragraph A be applicable?

This lack of clarity results in a potential non-compliant design (aka risk) or leads to unnecessary over-complicated and costly design. Wasting capital on an unnecessary design results in the inability to fund additional California requirement such as GHGp reduction requirements by CARB, or similar. A requirement to re-file for a project permit to remove or add heat recovery to a project's design results in project delays caused by the lengthy permitting process in most CA jurisdictions.

The lack of clarity is very disruptive to project execution, cost avoidance, and risk avoidance