

DOCKETED	
Docket Number:	25-BSTD-03
Project Title:	2028 Energy Code Pre-Rulemaking.
TN #:	269476
Document Title:	CALSSA Comments on March 12, 2026 updates to Solar Heating for an Existing Pool and Spa
Description:	N/A
Filer:	System
Organization:	Dara Yung
Submitter Role:	Public
Submission Date:	4/14/2026 1:17:06 PM
Docketed Date:	4/14/2026

*Comment Received From: Dara Yung
Submitted On: 4/14/2026
Docket Number: 25-BSTD-03*

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Additional submitted attachment is included below.



April 14, 2026

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814

Re: CEC Docket No. 25-BSTD-03 - CALSSA Comments on March 12, 2026 updates to Solar Heating for an Existing Pool and Spa

California Energy Commissioners and Staff:

The California Solar & Storage Association (CALSSA) appreciates the consideration of our previous comments in the March 12, 2026 updates to the proposed Title 24, Part 6 requirements for solar heating for existing pools and spas. In particular, relocating these requirements from Section 110.4 to Section 141.0, which addresses additions and alterations, is a logical and appropriate improvement that more clearly differentiates the exceptions between new pool heating systems and alterations.

However, we object to the inclusion of the alternative compliance pathway allowing the use of condensing gas pool heaters to meet the mandatory requirements. The stated justification for this option—namely, the challenges associated with upgrading existing gas pool heaters to solar thermal systems, heat pump pool heaters (HPPHs), or heat recovery systems—does not sufficiently support its inclusion.

A pool heating system that relies solely on a gas-fired heater should not be afforded equivalent consideration to systems that utilize renewable or high-efficiency electric technologies. Providing a gas-based compliance pathway risks undermining the intent of Title 24 by enabling continued reliance on fossil fuels rather than encouraging the adoption of cleaner alternatives. Pools needing replacement of existing heating equipment are likely to choose a condensing gas option regardless of Title 24 requirements, as this decision is primarily driven by the relative cost of equipment versus the rising cost of gas.

CALSSA understands that high-efficiency gas heaters may be needed as a compliance pathway in some circumstances. However, facilities should be required to demonstrate why they cannot reasonably utilize solar or heat pump systems before this option is permitted. Accordingly, the California Energy Commission (CEC) should consider removing option (d), which unconditionally allows pool heating systems that rely solely on a gas pool heater, and adding an additional Exception 5. This exception could apply where there is inadequate Solar Access Roof Area (SARA) and, on a case-by-case basis, where the local enforcing agency has determined that compliance is not feasible due to insufficient physical space for a new heat pump, required utility upgrades, or documented evidence showing that the alterations required to install a heat pump would disproportionately increase construction costs.



Additionally, the CEC should evaluate and consider broader eligibility for alternative solar thermal technologies, such as glazed solar thermal collectors, particularly for applications involving large pool heating loads, such as Olympic-sized pools, where unglazed solar thermal systems may not be practical.

These revisions would better align with California's Building Energy Efficiency Standards' core objectives of reducing wasteful, uneconomical, and unnecessary uses of energy; conserving nonrenewable resources such as natural gas; and ensuring renewable resources are utilized to the fullest extent possible to help avoid the need for new power plants, while still allowing reasonable flexibility in cases of genuine constraint.

Respectfully,

Dara Yung
Permitting Director
California Solar & Storage Association