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WPGA Comments on 2028 Energy Code Pre-Rulemaking

Additional submitted attachment is included below.



1107 9TH ST, SUITE 540, SACRAMENTO, CA 95814
P: (916) 447-9742 | F: (916) 447-9740
WESTERNPGA.ORG

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California Energy Commission
715 P Street
Sacramento, CA 95814
VIA ONLINE SUBMISSION

RE: Western Propane Gas Association Introductory Comments: 2028 Energy Code Pre-Rulemaking Workshops (Docket No. 25-BSTD-03)

The Western Propane Gas Association (WPGA) is pleased to submit comments on the California Energy Commission's (CEC) pre-rulemaking workshops for the 2028 Building Energy Efficiency Standards (2028 Energy Code). WPGA appreciates the professionalism and transparency CEC staff have brought to this process, and recognizes the significant effort involved in gathering technical input across the many measures now under consideration for the 2028 cycle.

WPGA represents propane marketers, producers, and equipment manufacturers serving millions of California households, farms, and businesses—many in rural, mountainous, and other hard-to-electrify communities that are not served by natural gas infrastructure. For these Californians, propane is often the only alternative to electric resistance, or the sole reliable backup during grid disruptions. These comments highlight propane's relevance across several of the measure categories identified in the pre-rulemaking workshops. As offered in our meeting with staff, we are available to provide more detailed technical and cost-effectiveness data as the proposals mature.

HYBRID HEATERS: A VALUABLE ALTERNATIVE

The CEC is considering updates to commercial HVAC measures, including rooftop heat pumps and hybrid heaters. As we have previously discussed, WPGA believes dual-fuel and hybrid appliances (increasingly fueled by conventional or renewable propane) represent an underappreciated compliance pathway that should be formally recognized in any future rulemaking. For example, delivered propane remains less expensive than electric-resistance backup on an energy-cost basis in certain applications and climate zones. We encourage the CEC to evaluate hybrid and dual-fuel propane systems on equal footing with all-electric approaches when assessing cost-effectiveness and grid-reliability benefits.

PROPANE POOL HEATING: SUPERIOR EFFICIENCY

The CEC is considering revisions to commercial pool and spa heating. WPGA urges the preservation of a workable propane exception pathway for commercial, institutional, and competitive aquatic facilities where propane's operating characteristics offer a genuine performance advantage over electric heat pump pool heaters. Unlike electric heat pumps, which can experience substantially reduced heating capacity and efficiency as outdoor temperatures decline, propane pool heaters operate independently of outdoor air temperature and can raise water temperature more efficiently than a comparably sized heat pump. For facilities with intermittent or scheduled use, this rapid, temperature-independent recovery is not just a convenience, but an operational necessity that a slower, temperature-dependent heat pump cannot reliably replicate. We ask that the CEC ensure that any tightening of requirements accounts for these real-world performance differences and does not inadvertently foreclose propane as a compliant backup or primary heat source, especially where solar collector area is constrained.

PROPANE AS A DATA CENTER SOLUTION

WPGA is also monitoring the Data Centers Efficiency Improvements measure, which focuses on economizer thresholds, computer room heat recovery, and fan controls for information technology equipment spaces. While the measure principally concerns cooling efficiency, the CASE Team's own justification for the proposal notes the dramatic growth in data center electric load and the resulting strain on the grid and ratepayers.¹ WPGA asks the CEC to consider the growing role that propane already plays as a lower-emission alternative to diesel for on-site backup and resiliency power at data centers and other mission-critical facilities. Propane heating systems can also complement economizer operation by efficiently providing supplemental heating for outside-air systems, reducing peak electrical demand associated with electric-resistance tempering, and supporting resilient facility operation through on-site fuel storage for backup generation. These functions can help maximize the operational benefits of economizer systems without increasing reliance on the electric grid during periods of peak demand.

Propane serves two distinct roles: as a clean-burning fuel and, in its R-290 form, as a low-Global Warming Potential (GWP) refrigerant. As California seeks to improve the efficiency and environmental performance of commercial cooling systems, R-290 represents a promising technology that can reduce refrigerant climate impacts while delivering high cooling efficiency. Propane also has a role to play in reducing data center water usage. R-290 chillers can support liquid-cooled data center designs that use dry heat rejection in lieu of evaporative cooling towers. By enabling efficient operation at the warmer coolant temperatures characteristic of direct-to-chip liquid cooling, these systems can substantially reduce or eliminate process water consumption for heat rejection while also utilizing an ultra-low-GWP refrigerant. In a state that regularly faces drought conditions, these benefits are a meaningful, but often overlooked factor in comparing alternative building energy pathways.

Finally, we encourage the CEC, as it evaluates the greenhouse gas and resource impacts of each proposed measure, to apply full life-cycle accounting consistently across fuels, inclusive of conventional and renewable propane.²

CONCLUSION

WPGA thanks the CEC for its continued engagement throughout the pre-rulemaking process. We welcome the opportunity to serve as an ongoing technical resource to the CEC's Building Codes section by providing cost-effectiveness data, connecting staff with equipment manufacturers, or working with staff to update the Energy Code's underlying source-energy and emissions factors to reflect the growing renewable propane supply. We look forward to reviewing draft regulatory language and appreciate the CEC's consideration of these comments.

Sincerely,



Krysta Wanner
Director of Government Affairs
Western Propane Gas Association
krysta@westernpga.org

¹ CASE Initiative, Data Centers Efficiency Improvements (Mar. 2026)

² Propane Education & Research Council, Renewable Propane.