

DOCKETED	
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Gabel Energy's Comments on 2028 Case Presentation â€“ Heat Pump Alteration Requirements to Large Single-zone RTUs

Thank you for the clarifying presentation. Attached is a letter with Gabel Energy's comments on the presentation.

Additional submitted attachment is included below.



July 17, 2026

To CEC Staff,

Topic: Session – 6/23/26: Expanding the Heat Pump Alteration Requirement to Large Single-zone RTUs

After attending the pre-rulemaking staff workshop on the 2028 Energy Code on Day 1 (6/23/26), I have the following concerns:

 What Is Being Proposed EXTEND §141.0(b) TO LARGER CAPACITY — RETAIL & RESTAURANT			
1 SCOPE	2 DEFAULT PATH	3 ALTERNATIVE	4 EXCEPTIONS
65,000 – 240,000 Btu/h (5.4 – 20 tons) Retail & restaurant Vintages: Pre-1978, 1978-1997	Replace gas-pack with SZVAVHP	Gas pack : 85 % Energy Recovery Ratio heat recovery 3-stage DX, 2-stage gas 25 % no-load fan	CZ 16: dual-fuel HP CZ 15: not required Panel capacity exception

1. It is very difficult to collect and enforce “vintage” of existing piece of equipment at plan check or over the counter and this opens up the possibility for people claiming the vintage is one that would exclude them from these requirements, and there would be no way to prove that at the AHJ.
2. Have there been consideration for “Restaurants” the process loads that might be supported by the RTU?
3. What would define a “sit-down restaurant”? I would strongly suggest we do not add more complexity to what we are already dealing with restaurants between how to determine building type for HVAC, ventilation, lighting, all-electric kitchen covered process requirements. Align the restaurant type triggers across all Energy Code requirements, when possible.
4. It is already very difficult to meet the fan energy requirements of the 2025 Energy Code for an RTU replacement that does not include new distribution and limiting it further will drive people to walk away from pulling a permit or misrepresent the fan power associated with the equipment selected. It is much easier to meet the fan energy requirements with multispeed, I suggest we leave it at getting the three-stage cooling and the two-stage heating and call that a win.

Please feel free to reach out if you have any questions or require clarification regarding the matters raised in this filing.

Sincerely,

A handwritten signature in black ink, appearing to read "Gina Rodda".

Gina Rodda, Principal
CEA, LEED AP
gina@gabelenergy.com
O: (510) 428-0803; D: (510) 944-0032

A handwritten signature in black ink, appearing to read "Marina Blanco".

Marina Blanco, Senior Energy Analyst
CEA, LEED AP
marina@gabelenergy.com
O: (510) 428-0803; D: (510) 944-0033