DOCKETED	
Docket Number:	25-BSTD-03
Project Title:	2028 Energy Code Pre-Rulemaking.
TN #:	272992
Document Title:	Magen eco Energy US Jerry Vega Comments - Title 24 2028-Pool MeasureSolar Thermal
Description:	N/A
Filer:	System
Organization:	Magen eco Energy US Jerry Vega
Submitter Role:	Public
Submission Date:	10/1/2026 6:14:55 AM
Docketed Date:	10/1/2026

Comment Received From: Magen eco Energy US Jerry Vega
Submitted On: 10/1/2026
Docket Number: 25-BSTD-03

Title 24 2028- Pool MeasureSolar Thermal

Magen eco Energy is a manufacturer of solar thermal pool heating systems/collectors, and we have worked with dealers and installers throughout California for many years. Based on our experience in the market, we believe solar thermal is a viable and proven solution for heating commercial and nonresidential swimming pools in California.

One of the significant advantages of solar pool heating is that once installed, the primary source of energy used to heat the pool is solar energy. For facilities with substantial pool-heating demand, solar thermal can reduce the amount of energy that otherwise needs to be supplied by conventional heating equipment.

We also believe it is important to look at solar thermal as part of the overall pool-heating system rather than necessarily as a replacement for every other heating technology. Depending on the facility, operating requirements, available installation area, and desired water temperature, solar thermal can work alongside supplemental heating while reducing the amount of conventional energy required.

From an implementation standpoint, these are systems that are already being installed, serviced, and supported in the California market today. There is an established network of experienced solar pool heating contractors, and manufacturers such as Magen provide the equipment and technical support necessary for these applications.

We understand there have been discussions regarding technical feasibility, cost, and implementation as part of developing the proposed measure. We would be happy to provide additional information from the manufacturerâ€™s perspective, including system design considerations, product performance information, or examples of existing commercial installations if that would be helpful to the Commission.

Magen supports continued consideration of solar thermal pool heating as an energy-efficiency option for existing nonresidential pools as part of the 2028 Building Energy Efficiency Standards process.