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Trane Unitary Comments - Title 24-2028 Express Terms

Additional submitted attachment is included below.

November 5, 2026

Michael Sokol
Director for Efficiency Division
California Energy Commission
Docket Unit, MS-4
Docket No. 25-BTSD-03

Dear Director Sokol,

Thank you to the California Energy Commission (CEC) for the opportunity to provide comments on the Title 24-2028 Express Terms.

Trane Technologies is a world leader in creating comfortable, sustainable, and efficient environments and leading our industry in sustainability practices. Through our strategic brands Trane and Thermo King, and our portfolio of environmentally responsible products and services, we bring efficient and sustainable climate solutions to buildings, homes and transportation. Our bold 2030 Sustainability Commitments are central to our business strategy and include a pledge to reduce our customers' carbon emissions by one gigaton (2% of the world's annual emissions) and to bring our own operations to carbon neutral. Our ambitious greenhouse gas (GHG) emissions reduction targets which have been verified by the Science Based Targets Initiative (SBTi) challenge us to lead by example, collaborate with our customers to drive sustainable innovation and create opportunity for all in our workplace and our communities.

Fan Control (401.3.14.4)
In this section, we have concerns with statement 4.2 and the mention of mechanical heating in the requirement. We propose to remove mechanical heating from the language as follows:

4.2. When all zones are operating either within their *thermostat deadband* or in *occupied standby mode*, the system shall operate at a supply airflow no greater than the rate defined in Section 401.3.14.4.1. Upon calls for ~~*mechanical heating* or *mechanical cooling*~~ from the zones, the system supply airflow shall not exceed the sum of the *primary airflow* setpoints for each zone.

In the definitions section, mechanical heating is defined as all sources of heating (gas, electric as well as heat pump DX heating). Operating at lower airflow rates during heating will not only hurt heating efficiency performance but can also cause heaters to cycle on their safety limits. We recommend removing the mention of mechanical heating from the statement altogether.

Single Zone RTU Replacements (401.5.2.2.1.2):
We appreciate and support the addition of single zone rooftops 65,000 BTU/h or greater to this section. However, for both Table 401.5(2) and 401.5(3), we propose to allow dual fuel heat pumps to satisfy the requirement for a single zone heat pump or single zone VAV heat pump rather than a single zone AC or single zone VAV AC. Dual fuel heat pumps are widely available

in the marketplace across this full rooftop capacity range. These products enable transitioning to heat pumps without additional costly electrical panel upgrades which is of particular concern in replacements. In addition, dual fuel heat pumps provide relief to electrical power grid capacity during the winter peak loads.

We appreciate the work the CEC has put into the rulemaking process. Thank you again for the opportunity to provide feedback on the proposed requirements. Please contact us if there are any additional questions.

Sincerely,

Beth Braddy
Unitary Regulatory Affairs Leader