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SCE Comments for 2022 Energy Code Workshop #3

Additional submitted attachment is included below.

February 11, 2020

California Energy Commission
Docket Office, MS-4
Re: Docket No. 19-BSTD-03
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission Docket No. 19-BSTD-03: Staff Workshop - 2022 Energy Code Pre-Rulemaking – Low-Rise Residential Heat Pump Baseline Workshop

Dear Commissioners:

On January 26, 2021, the California Energy Commission (CEC) hosted a workshop to present and discuss proposed changes for heat pump baselines for low-rise residential buildings for the 2022 update of the Building Energy Efficiency Standards (Energy Code).

The webinar included staff presentations on proposed updates to the 2022 Energy Code, specific to heat pump baselines for low-rise residential buildings. This is the third workshop focusing on heat pump baselines. The prior workshops on October 6, 2020 and December 8, 2020 discussed heat pump baselines for high-rise residential buildings and selected nonresidential building categories.

Southern California Edison (SCE) appreciates the opportunity to submit comments on the workshop, as set forth below.

I. SCE supports transition to an all-electric energy code for new construction.

Consistent with comments submitted in previous workshops for the 2022 Energy Code, SCE continues to support an all-electric code to align with the State's carbon neutrality goal that will avoid natural gas emissions and additional spending on natural gas infrastructure that may become stranded before 2045.

SCE appreciates the CEC's efforts in moving towards an all-electric code and pressing forward to an electric heat pump baseline for water or space heating for every climate zone. While SCE understands the constraints that the CEC has to work within to adopt updates to Title 24, Part 6, we nonetheless urge the CEC to go further in requiring heat pumps for both space and water heating in all climate zones (with possible exceptions for extremely cold areas) to encourage electrification and mitigate the current climate crisis. Delaying action until 2025 means that a code effective January 1, 2026 will not

February 11, 2021

meaningfully produce all-electric homes on the market until 2027-2028. Time is of the essence to meet near-term goals. The longer we wait to adopt an all-electric code, or at a minimum heat pumps for both space and water heating, the greater the carbon emissions will severely impact the state. We further recommend the CEC collaborate more closely with the CPUC regarding such matters as decarbonization and electrification, grid harmonization, demand response, onsite renewable clean generation, energy storage, water use, etc., to ensure consistency across agencies, and alignment with the CEC's aggressive approach to meeting the state's GHG reduction goals.

II. SCE recommends additional language to clarify all-electric readiness measures.

Short of an all-electric code, SCE makes the following comments to support customers' future transition to heat pumps (i.e., all-electric readiness measures). SCE requests that the CEC further study the electric circuits for space heating under the all-electric measures. The proposed 240V, 30A circuit for the air handler assumes that electric resistance heating elements will be required for a future heat pump.¹ However, there are many sufficiently mild climate zones where a minimum efficiency heat pump would have sufficient heating capacity without electric resistance supplemental heating. For these areas, the load for a future heat pump air handler should be no higher than for a gas forced air furnace and should be sized accordingly.

In addition to the 2019 Title 24 water heating requirements for future heat pump electric water heaters (Title 24 Part 6 Section 150.0(n)), where a gas water heater is installed in an individual dwelling unit, there should be requirements to ensure there is an acceptable location for the future heat pump water heater. Therefore, if a tankless gas water heater is installed on an exterior wall, there will also need to be a suitable indoor location for a future heat pump water heater identified on the floor plans. This location will need to comply with the 2019 requirements for future electrical connections and to allow for plumbing connections from the gas water location.

¹ CEC presentation, "2022 Pre-Rulemaking for Building Energy Efficiency Standards," January 26, 2021, Slide 40 assumes that electric resistance heating elements will be required for a future heat pump.

CEC presentation is available here:

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=236492&DocumentContentId=69488>

III. Conclusion

SCE thanks the CEC for consideration of the above comments and looks forward to continuing its partnership with stakeholders to develop the 2022 Energy Code. Please contact me at (415) 929-5518 with questions. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/

Dawn Anaiscourt