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**Trane Technologies Pre-rulemaking Comments_2022 Heat Pump
Baseline**

Additional submitted attachment is included below.



February 11, 2021

California Energy Commission
Docket Office, MS4
1516 Ninth Street, MS4
Sacramento, CA 95814-5512

(Submitted electronically via CEC e-commenting page)

Re: 2022 California Energy Code Pre-Rulemaking Workshop for Heat Pump Baseline.
(Docket No 19-BSTD-03)

Dear CEC Staff,

Thank you for the opportunity to comment on the January 26, 2021 California Energy Commission (CEC) pre-rulemaking workshop regarding the proposed 2022 Building Energy Efficiency Standards (Energy Code).

Trane Technologies (Trane) 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. These commitments 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.

Reducing our customers' carbon emissions is what drives our support for building decarbonization, and we are excited that CEC is proposing a holistic approach to decarbonizing buildings through the electrification of space heating technologies.

As policy propels California's transition to a fully electric grid by 2045, the timing of electrification is crucial to our customers as additional electricity demand prior to a clean grid will actually increase emissions in the short term. CEC's proposal to move towards an all-electric Energy Code by 2025 allows time to reduce its grid's reliance on fossil



fuels, resulting in lower marginal CO2 emissions generated from the electric grid as electricity demand is increased.¹

Trane supports CEC's proposal to introduce a heat-pump baseline for space heating technologies in the specified climate zones along with the option to demonstrate compliance through the use of any one of the following: a heat pump water heater; a heat pump space heater; or a dual-fuel heat pump. We also support the inclusion of all-electric ready measures for space heating technologies as an incremental step in the transition to all-electric buildings in the 2025 code cycle.

We appreciate the work by CEC staff to develop a cost-effective, performance-based Energy Code that propels the transition to all-electric buildings while allowing time for the grid and heat pump market to adjust. As other states look to California for their climate leadership, we are excited to support this performance-based approach to drive strategic electrification and building energy efficiency improvements in the United States. This approach provides a strategic electrification model in colder climates or areas where the grid relies heavily on fossil fuels without compromising comfort, cost, performance, or causing increased marginal carbon emissions.

Thank you for the opportunity to participate and provide feedback during this pre-rulemaking period. We look forward to staying engaged in the development of the 2022 Energy Code.

Sincerely,

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

Jennifer Kane
Energy & Sustainability Analyst
Jennifer.Kane@tranetechnologies.com

¹ Nelson Ditcher, Aref Aboud, [Analysis of Greenhouse Gas Emissions from Residential Heating Technologies in the USA](#) (2020).