DOCKETED	
Docket Number:	22-DECARB-01
Project Title:	Heat Pump and Decarbonization Goals
TN #:	242749
Document Title:	California Building Industry Association (CBIA) Comments on Staff Workshop on Heat Pump Goals & Supply Chain
Description:	N/A
Filer:	System
Organization:	California Building Industry Association
Submitter Role:	Public
Submission Date:	4/22/2022 11:28:48 AM
Docketed Date:	4/22/2022

Comment Received From: California Building Industry Association

Submitted On: 4/22/2022

Docket Number: 22-DECARB-01

CBIA Comments on Staff Workshop RE Heat Pump Goals & Supply Chain

Additional submitted attachment is included below.



1215 K Street, Suite 1200 Sacramento, CA 95814 (916) 443-7933 fax (916) 443-1960 www.cbia.org

2022 OFFICERS

Chair
MICHAEL BALSAMO
Rancho Mission Viejo

Vice Chair

JEFF SCHROEDER

Ponderosa Homes

Treasurer
CHRIS AUSTIN
DPFG

President/CEO
DAN DUNMOYER

MEMBER ASSOCIATIONS

Building Industry Association of the Bay Area

Building Industry Association of Fresno/Madera Counties

Building Industry Association of the Greater Valley

Building Industry Association of San Diego County

Building Industry Association of Southern California

Building Industry Association of Tulare & Kings Counties

Home Builders Association of the Central Coast

Home Builders Association of Kern County

North State Building Industry Association

April 21, 2022

Mr. J. Andrew McAllister, Ph.D. Commissioner California Energy Commission 1516 Ninth Street Sacramento, CA 95814-5512

RE: Docket No. 22-DECARB-01 (CBIA Comments on the Staff Workshop on Heat Pump Goals, Supply Chain and Programs)

Dear Commissioner McAllister,

The California Building Industry Association (CBIA) is a statewide trade association representing over 2,700 member companies involved in residential and commercial construction. CBIA members are responsible for over 85% of the new homes built in California each year.

CBIA appreciates the opportunity to provide comments on the April 5 CEC Staff Workshop on Heat Pump Goals, Supply Chain, and Programs. Reducing greenhouse gas emissions (GHG) and increasing the resiliency of buildings are critical steps for California to mitigate climate change impacts.

CBIA echoes the concerns raised by several of the heat pump manufacturers during the April 5 workshop – some of the manufacturer comments were:

- "There is currently no real heat pump technology in California it takes time" there are significant supply chain challenges."
- "We have unique challenges with manufacturing and supply chain in delivering heat pumps to California."

The building industry is under immense pressure to deliver significantly more housing in the coming years to counter the state's current historic housing crisis. The pandemic only exacerbated already strained manufacturing and supply chain delays. The CBIA has a long history of supporting the CEC's energy standards updates in 2011, 2014, 2017, and 2020. CBIA support included the 2020 rooftop solar mandate, which took more than a decade of proper planning, training, and increasing the market penetration to roll out successfully. With barely a 2% market penetration for heat pump water heaters in CA, the CEC must ensure the manufacturing, training, market penetration, and installation incentives are all increased significantly in the coming years to ensure success.

The State of California is rapidly moving towards decarbonizing new buildings and transitioning the transportation sector to zero carbon. The electrification of new homes will increase household electricity consumption by roughly threefold, not including EVs. While CBIA supports the CEC's decarbonization goals, there is lingering doubt whether a one-size-fits-all electrification approach is

an appropriate solution. The building industry needs certainty and dependability in heat pump availability, supply chain movement, and costs.

Thank you in advance for your consideration of CBIA's concerns, and please feel free to reach out to me directly if you have any questions.

Sincerely,

Bob Raymer for Chris Ochoa

Christopher E. Ochoa, Esq. Senior Counsel for Codes, Regulatory And Legislative Affairs