

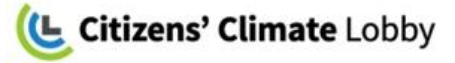
DOCKETED

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Project Title:	2025 Energy Code Pre-Rulemaking
TN #:	251557
Document Title:	RMI Comments - 40+ Orgs Request Residential AC to HP in Part 6
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Submitted On: 8/9/2023
Docket Number: 22-BSTD-01*

40+ Orgs Request Residential AC to HP in Part 6

Additional submitted attachment is included below.

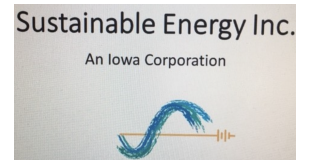


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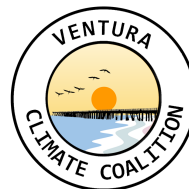


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Sustainable San Mateo County

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August 9, 2023

California Energy Commission
Re: Docket No. 22-BSTD-01
715 P Street
Sacramento, CA 95814
docket@energy.ca.gov

**Re: July 27, 2023 Staff Workshop: 2025 Energy Code Pre-Rulemaking –
Energy Code Heat Pump Baselines and Solar Photovoltaic System Requirements**

Dear Commissioners:

The undersigned organizations appreciate the opportunity to comment on the California Energy Commission’s (“CEC”) 2025 Title 24 Building Energy Efficiency Standards (“2025 Building Code”) proposal introduced at the July 27 workshop on Heat Pump Baselines and Solar Photovoltaic System Requirements. The 2025 Building Code is a critical opportunity to move California's buildings away from polluting gas appliances to clean efficient electric alternatives. We strongly support the CEC’s proposed inclusion of both heat pump space and water heating as the new construction baseline in single- and multi-family and the expansion of the space heating new construction baselines to larger nonresidential buildings. We also strongly support the proposed requirements that gas-fired single zone rooftop cooling units in existing buildings be replaced with heat pumps when equipment is changed out.

We are significantly concerned, however, with the current proposal’s relegation of the replacement of residential central air conditioning (“A/C”) units with heat pumps to a *voluntary* section of the Building Code. Because heat pumps provide both heating and cooling, every A/C to A/C replacement is a lost opportunity to displace methane gas heating. Due to their similar installation requirements, replacing central A/C units with a heat pump is a low-cost intervention that protects against gas price volatility, reduces fossil fuel dependency, improves air quality and public health, and avoids the need for future gas furnace replacement. As noted in a PG&E furnace replacement study, “heat pump retrofits have a smoothing effect on customer bills” and “[m]onthly energy costs are more consistent and predictable.”¹ Similarly, staff’s analysis at the workshop showed A/C to heat pump replacements result in lifetime cost savings in all climate zones.

Approximately 1.9 million residential A/C units are currently due for replacement in California. Ensuring these units are replaced with heat pumps is essential to successful implementation of the Bay Area Air Quality Management District and California Air Resource Board zero-emission space heating requirements that will go into effect at the end of this decade. By requiring A/C to heat pump replacement, the CEC can avoid situations where a homeowner replaces an A/C with another A/C unit in

¹ TRC, PG&E Furnace Replacement Initiative Case Study, at v (Oct. 2022), https://pda.energydataweb.com/api/view/2725/PGE%20Furnace%20Replacement%20Initiative%20Case%20Study_Report_10112022.pdf.

2027, only to find that in 2030 they are now required to replace their gas furnace with a heat pump. The CEC must take this opportunity to support the important work of their sister agencies by laying the groundwork for increased deployment of heat pump space heating in advance of these important air quality regulations taking effect.

The climate and the state's impending policies cannot wait an additional three years to transition this important pathway from voluntary to prescriptive. In its next iteration of proposed updates to the 2025 Building Code, the CEC should move this measure from the voluntary to the prescriptive section of the building code.

Thank you for your consideration of these comments. We look forward to continued engagement with the CEC on your 2025 Energy Code Pre-Rulemaking.

Sincerely,

Jonny Kocher
Manager
RMI

Chris Brown
Coordinator
Sacramento Climate Coalition

Sven Thesen
Co-Founder
Project Green Home

Jody Timms
Founder
350Marin

Matt Vespa
Senior Attorney
Earthjustice

Brandon Dawson
Director
Sierra Club California

Robert Haw
Building Decarbonization Team
Climate Action California

Pauline Seales
Santa Cruz
Climate Action Network

Laura Feinstein
Sustainability and Resilience Policy Director
SPUR

Jenny Green
Member
Mothers Out Front Silicon Valley

Nihal Shrinath
Associate Attorney
Sierra Club

Elaine Salinger
Co-Leader
CCL San Mateo County

Andrea Leon-Grossmann
Deputy Program Director - West
Vote Solar

Nicole Capretz
Founder and Chief Executive Officer, Climate
Action Campaign

Lauren Weston
Executive Director
Acterra: Action for a Healthy Planet

Brian Stewart
Co-Founder
Electrify Now

Marti Roach
Action Co-Lead
350 Contra Costa Action Local Policy

Marti Roach
Board Member
350 Bay Area Action

Cheryl Weiden
Steering Committee
350 Silicon Valley

Alan Weiner
Chapter Lead
350 Conejo / San Fernando Valley

Laura Rosenberger Haider
Secretary
Fresnans Against Fracking

Terry Nagel
Interim Executive Director
Sustainable San Mateo County

Ellie Cohen
CEO
The Climate Center

Colleen FitzSimons
Executive Director
San Diego Green Building Council

Mark Roest
Director of Marketing & International
Development
Sustainable Energy Inc.

Mitchel Slomiak
Board Chair and Co-Founder
Menlo Spark

Tonya Parnak
Founder
350 Petaluma

Dan Brotman
Mayor
City of Glendale

Jan Dietrik
Policy Team Leader
350 Ventura County Climate Hub

Faith Myra
Member
Protect Playa Now

Rachelle Boucher
Senior Lead, Culinary Events & Experiences
Building Decarbonization Coalition

Avery Ray Colter
Certified Energy Analyst
Fard Engineers

David Moller, P.E.
Lead
Marin/Sonoma Building Electrification Squad

Cheryl Weiden
Member
350 Silicon Valley

Haley Ehlers
Director
Climate First: Replacing Oil & Gas (CFROG)

Steve Schmidt
Founder & COO
Home Energy Analytics (HEA)

Bruce Hodge
Chairman
Carbon Free Palo Alto

Bruce Hodge
Chairman
Carbon Free Silicon Valley

Elise Kalfayan
Board Member
Glendale Environmental Coalition

Tonya Parnak
Founder
350Petaluma

Kathleen Wheeler
Co-founder
Ventura Climate Coalition

Leane Eberhart
Architect

Mary Lou Meeks
Individual