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*Comment Received From: Adam Sweeney
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**Climate Reality Project Silicon Valley Comments on the 2025
Building Code Proposal**

Additional submitted attachment is included below.



September 30, 2023

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

Dear Commissioners,

The Climate Reality Project: Silicon Valley Chapter is an all-volunteer group of over 350 members working to prevent the worst of climate change in our communities and the world. We advocate for science-based solutions to the climate crisis that will carry us forward into a cleaner, healthier, more prosperous future. We are excited to see the 2025 Building Code proposal including important changes to replace polluting, gas-fired appliances in our buildings with clean, electric alternatives.

Specifically, we strongly support the current proposals to:

- Make electric heat pump space heating and electric heat pump water heating the new construction baseline for single and multi-family developments.
- Expand the new construction baseline requiring electric heat pump space heating and electric heat pump water heating to include larger non-residential buildings.
- Require electric heat pump space heaters for the replacement of gas-fired single zone rooftop cooling units in existing buildings.

We think that the proposal can be much better, though. The current proposal makes the replacement of residential central air conditioning units with electric heat pumps voluntary rather than required. This would be a missed opportunity to get heat pumps for both cooling and heating installed in homes at the very time that building owners are making this significant investment in new equipment. Electric heat pumps are cost-competitive at installation and often more efficient than their ancestral air-conditioning-only counterparts. Central air conditioners that cannot also heat the buildings they serve should be a relic of our past.

Importantly, the opportunity to replace the installed air conditioning equipment comes up only every 15-20 years in most buildings, so why would we delay when we know that the heating equipment in these same buildings needs to be electrified in the near future to meet our clean air and climate goals. Getting the space conditioning equipment in place all at once, with a cost-competitive solution that satisfies both cooling and heating needs, is a win for everyone.

Thank you for your work in transitioning our buildings to a fully electrified future.

Sincerely,

Adam Sweeney
Co-Chair
The Climate Reality Project: Silicon Valley Chapter