

DOCKETED

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Earthjustice, Sierra Club, NRDC, RMI et al 2025 Energy Code Pre-Rulemaking Comments

Additional submitted attachment is included below.



Kate Harrison Councilmember District 4 The Climate Reality Project CALIFORNIA STATE COALITION



October 3, 2023

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

Re: 2025 Energy Code Pre-Rulemaking – Energy Code Heat Pump Baselines and Retrofit Proposal

Dear Commissioners:

The undersigned organizations and individuals appreciate the opportunity to comment on the California Energy Commission’s (“CEC”) 2025 Title 24 Building Energy Efficiency Standards (“2025 Building Code”) pre-rulemaking process. 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 Resources 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 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

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.

groundwork for increased deployment of heat pump space heating in advance of these important air quality regulations taking effect.

Additionally, the U.S. Climate Alliance (USCA) recently announced that a consortium of 25 state governments across the country— including California Governor Gavin Newsom – have committed to collectively achieving the deployment of 20 million heat pumps across America by 2030; this amounts to a quadrupling of the number of heat pump installations happening to date. As part of the USCA announcement, California joined a subset of 12 states further committing to support the adoption of advanced energy-efficient building codes that maximize opportunities for efficient electrification. These commitments can not be achieved without a focus on appliance replacement in existing buildings, and the 2025 building code update represents the last timely opportunity for California to turn commitment into action.

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,

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