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*Comment Received From: Anyamarie Goeders  
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## **Remove Proposed Heat Pump Baseline!**

While I understand the intent to electrify the HVAC industry, homogenous and expensive HVAC systems are not the answer.

I do not believe that the cost analysis presented in the CEC's reports are accurate and well justified. I think the report greatly underestimates the cost of air to water heat pumps, dedicated outdoor air units, and four pipe fan coils. The costs of these systems do not align with costs that are on the market today and defy common sense. Additionally, requiring in-depth cost and performance analysis to utilize other types of systems is very costly and can make it unaffordable for people to purchase any new HVAC system. This in turn reduces flexibility and affordable options for designers, contractors, building owners, occupants, operators, and manufacturers.

Not only are FPFC, DOAS, and AWHP systems costly, the principle of having only these systems make up a significant portion of our HVAC systems lowers the possibility for competitiveness and innovation. With these new measures, we are limiting the market and restricting the various designs that are not only more cost effective, but also more efficient, easier to install and operate.

For those reasons, I think that new requirements in 140.4(a)3 should be removed until further analysis and public review takes place. I believe that these measures are too severe to enact without more input from all the stakeholders that will be greatly impacted. Therefore, I urge the CEC to remove the proposed heat pump baseline.