

DOCKETED	
Docket Number:	24-BSTD-01
Project Title:	2025 Energy Code Rulemaking
TN #:	255648
Document Title:	Aaron Wintersmith Comments - Remove the proposed heat pump baselines in 1404(a)3
Description:	N/A
Filer:	System
Organization:	Aaron Wintersmith
Submitter Role:	Public
Submission Date:	4/12/2024 8:10:23 AM
Docketed Date:	4/12/2024

*Comment Received From: Aaron Wintersmith
Submitted On: 4/12/2024
Docket Number: 24-BSTD-01*

Remove the proposed heat pump baselines in 1404(a)3

I urge the CEC to remove the proposed heat pump baselines in 140.4(a)3.

The proposed changes significantly and unduly restrict compliance options for HVAC systems in offices and schools. In addition The CEC's workshop presentations to date have not provide sufficient detail and justification for a measure that would have profound impacts to typical practice for office and school HVAC systems. The Heat Pump Baseline Report that was posted to the docket on March 28, 2024 along with the 45-day language was provided extremely late in the process. This significantly limits the opportunity for affected stakeholders to adequately participate in the public review process, and does not provide sufficient time to address serious flaws in the supporting analysis and proposal. For such a radical and restrictive change to Title 24, the CEC must provide a timely and comprehensive report documenting the detailed assumptions and calculations that support their analysis, as well as considerations of negative impacts to designers; contractors; building owners, occupants, and operators; and equipment manufacturers.

While the CEC's proposed changes may be well intended, there appear to be serious flaws in the analysis, there continue to be gaps in the supporting documentation, and the resulting constraints on industry are too severe to enact without more stakeholder engagement and opportunity for detailed review. The late posting of the Heat Pump Baseline Report with the 45-day language does not provide impacted stakeholders sufficient time to review and comment and for CEC to address significant errors in the analysis and shortcomings in the proposed language. Therefore we respectfully request that the CEC remove the proposed heat pump baseline language.