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Dual-Fuel Heat Pumps

Additional submitted attachment is included below.



May 1, 2024

California Energy Commission
Docket Unit
Docket No. 24-BSTD-01
715 P Street
Sacramento, CA 95814

Re: Title 24-2025 Energy Code – Docket No. 24-BSTD-01

Dear Commissioners and CEC Staff,

Thank you for the opportunity to comment on the recently published 45-day express terms for Title 24-2025. It is clear that a tremendous amount of work has gone into the updates for the energy code. However, we still have questions regarding the Commission's definition of dual-fuel heat pumps and how they apply to this code.

Trane Technologies is a world leader in creating comfortable, sustainable, and efficient environments and leading our industry in sustainability practices. Through our strategic brands Trane and Thermo King, and our portfolio of environmentally responsible products and services, we bring efficient and sustainable climate solutions to buildings, homes and transportation. Our bold 2030 Sustainability Commitments are central to our business strategy and include a pledge to reduce our customers' carbon emissions by one gigaton (2% of the world's annual emissions) and to bring our own operations to carbon neutral. Our ambitious greenhouse gas (GHG) emissions reduction targets which have been verified by the [Science Based Targets Initiative \(SBTi\)](#) challenge us to lead by example, collaborate with our customers to drive sustainable innovation and create opportunity for all in our workplace and our communities.

As a global HVAC manufacturer, Trane Technologies has a strong track record demonstrating a commitment to the electrification of buildings as the organization works to achieve a sustainable future. We are at the forefront of setting new standards to improve the health and well being of the indoor environment across communities. Furthermore, Trane Technologies shares with the California Energy Commission a commitment to bringing efficient and sustainable climate innovations to the built environment to help achieve sensible long-term clean energy goals with updates to the 2025 energy code.

Dual-Fuel Heat Pumps (Section 141.0)

In Section 141.0 regarding additions, alterations and repairs to existing buildings, Table 141.0-E-1 specifies new or replacement single zone air conditioner or heat pump requirements. We seek clarification from the CEC on the definition of Single Zone Heat Pump (SZHP) and Single Zone Heat Pump + Economizer (SZHP1). Is a dual-fuel heat pump considered equivalent to a



SZHP or SZHP1? It is our understanding that a dual-fuel heat pump would indeed fall into the same product category as a SZHP or SZHP1 due to the primary heat source of a dual-fuel heat pump being the heat pump with gas heat as the auxiliary heat source.

The inclusion of dual-fuel heat pumps under the product category of heat pumps in retrofit opportunities would benefit the state of California in climate zones inclusive of the high desert and other zones with lower ambient temperatures. Dual-fuel heat pumps would provide these climate zones with the option to take advantage of heat pump technology for a larger portion of their heating bin hours where they would otherwise only be able to utilize high efficiency gas fired units for heat.

Trane Technologies greatly appreciates the California Energy Commission's commitment to sustainability and the clean energy future of the state of California. We look forward to your response with clarifications around dual-fuel heat pumps.

Sincerely,

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