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Comment Received From: Melissa Yu
Submitted On: 5/13/2024
Docket Number: 24-BSTD-01

Comments on 2025 Building Standards Title 24

Please find attached a letter commenting on the 2025 Title 24 Building Energy Efficiency Standards on behalf of the signed organizations, elected officials, and individuals.

Additional submitted attachment is included below.



NorCal Chapter



SoCal Chapter

CARBON FREE PALO ALTO



Acterra

ACTION FOR A HEALTHY PLANET





May 13, 2024

California Energy Commission
Re: Docket No. 24-BSTD-01
715 P Street
Sacramento, CA 95814
docket@energy.ca.gov

Re: Comments on 45-Day Language for 2025 Building Energy Efficiency Standards, Docket No. 24-BSTD-01

Dear Commissioners and CEC Staff,

The undersigned organization, city elected officials, and individuals commend the California Energy Commission’s (CEC) work in developing the 2025 Title 24 Building Energy Efficiency Standards (“Building Code”). As we all recognize, the Building Code is a critical tool to decarbonize California’s buildings and achieve our climate and air quality objectives.

We strongly support critical advances to the Building Code in the 45-day language that further building decarbonization, including expanded heat pump baselines for new construction in residential and commercial buildings and provisions that strongly encourage replacement of single-zone packaged rooftop units used in commercial buildings with heat pumps. Taken together, these measures will help ensure emissions-free heating and cooling in California's new buildings and begin to make in-roads into decarbonizing existing commercial buildings.

However, with California behind in meeting its climate objectives, it is incumbent on the CEC to ensure the 2025 Building Code realizes its full potential in reducing fossil fuel dependency in buildings. We are therefore concerned that the 45-Day Language eliminates key provisions from the earlier draft that would accelerate heat pump deployment and their corresponding climate, air quality and public health benefits in existing homes. Notably, the current draft omits prescriptive requirements that would encourage households statewide to install two-way heat pumps when replacing old air conditioning (AC) units. Due to their similar installation requirements, replacing central AC 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.

Moreover, including AC to heat pump replacement provisions in the Building Code are necessary to lay the groundwork for successful implementation of Air District and California Air Resources Board (CARB) zero-emission appliance standards. Because heat pumps provide both heating and cooling, restoring proposed provisions that require heat pump installation at the time of AC replacement provide a zero-emission heating source that avoids the future need to install a heat pump at the time of furnace replacement. Accordingly, we ask that the CEC prescriptively require new and full replacement residential air conditioning systems installed in major alterations be heat pumps as part of the 2025 Building Code. At a minimum, the CEC should prescriptively require heat pumps when the A/C replacement also includes replacement of ductwork and commit to revisiting heat pump replacement for routine A/C replacements in a mid-cycle review.

Thank you for your consideration of these comments.

Sincerely,

John Gioia, County Supervisor
Contra Costa County

John J. Bauters, Councilmember
City of Emeryville

Rafael Mandelman, Supervisor
City of San Francisco

Jen Wolosin, Councilmember
City of Menlo Park

Chance Cutrano, Councilmember
Town of Fairfax

Sophie Hahn, Councilmember
City of Berkeley

Dan Brotman, Council member
City of Glendale

Zach Hilton, Councilmember
City of Gilroy

Betsy Nash, Councilmember
City of Menlo Park

Danielle Mieler, Sustainability and
Resilience Manager
City of Alameda

Shannon Parry, Chief Sustainability Officer
City of Santa Monica

Sam Fishman, Sustainability and Resilience
Policy Manager
SPUR

Sean Armstrong, Managing Principal
Redwood Energy

Leslie Alden, Executive Director
Act Now Bay Area

Ned Orrett
Former Climate Action Commissioner

Barbara Moulton, Volunteer Group Leader
Citizens' Climate Lobby, Santa Rosa Group

Monica Mallon, Coordinator
Silicon Valley Youth Climate Action

Zach Pierce, Director, State & Regional
Policy
Rewiring America

Bruce Hodge, Founder and Chair
Carbon Free Palo Alto

Marj Plumb, Executive Director
Physicians for Social Responsibility, San
Francisco Bay

Beckie Menten, Senior Regulatory and
Policy Specialist
Building Decarbonization Coalition

Melissa Yu, Building Electrification Senior
Field Organizer
Sierra Club

Merrian Borgeson, Policy Director,
California, Climate & Energy
NRDC (Natural Resources Defense Council)

Annie Stuart, Steering Committee Member
350 Petaluma

Jose Torre-Bueno, Executive Director
Center for Community Energy

Abe Mazliach
Citizens' Climate Lobby

Sailesh Nepal
Citizen Climate Lobby

Cheryl Weiden, Steering Committee
350 Silicon Valley

Mark Grossman, Coordinator
350 Silicon Valley

Justin Zagunis, Director of Decarbonization
Programs and Policy
Silicon Valley Clean Energy

Todd Weber, Volunteer, Chapter Co-Leader
Elders Climate Action (ECA) Northern
California (NorCal) Chapter

Richard Burke Founder, Chapter Leader
Elders Climate Action (ECA) Southern
California (SoCal) Chapter

Tom Graly, Co-Leader
Berkeley Electrification Working Group

Cooper Marcus, Chief Quitter and CEO
QuitCarbon

Marti Roach, Member Leadership
Governance Team
350 Contra Costa Action

Nancy Haber, Coordinating Committee
350 San Francisco

Jody Timms, Ph.D., Co-Founder, 350Marin
350Marin

Linda Hutchins-Knowles, Co-Founder and
Team Coordinator
Mothers Out Front Silicon Valley

Susan Green, Steering Committee Member
SF Climate Emergency Coalition

David Moller, P.E., Professional Engineer
Marin/Sonoma Building Electrification
Squad

Marc Friedmann, Co-lead Electrification
Action Team
Citizens Climate Lobby

Micah Perlin, Director
California Climate Voters PAC

Andrew McNamara, Principal
Carbon Zero Buildings

Connie Miller VP, Clean Air Lead Green
Town Los Altos
GreenTown Los Altos

Blake Herrschaft, Director
Electrify Tahoe

David Warren
Northern California Elders Climate Action

Marilyn Price, Co-Chair
Sustainable Mill Valley

Lauren Weston, Executive Director
Acterra: Action for a Healthy Planet

Ann Feeney, Co-chair, Building
Electrification team
SanDiego350

Susan Wayo, Director of Operations
Center for Community Energy

Pauline Seales, Organizer
Santa Cruz Climate Action Network

Nathan Taft, Senior Campaigner
SAFE cities at Stand.earth

Robert Whitehair, Co-Leader
San Mateo Climate Action Team

Lisa Jackson, 350 Bay Area Action Board
Member
350 Bay Area Action

Jonathan Klein, Co-Founder and CEO
UndauntedK12

Bronwyn Barry, Policy Director
Passive House Network

David Chanin, Founder
FutureFit Partners

Dan Johnson, Architect
Beyond Efficiency Inc
Gopal Shanker, President
R colte Energy

Debra Little, Bldg Efficiency Consultant
AJO

Khanh Nguyen, Board Member
The Progressive Vietnamese American
Organization

Christopher A. Galarza, Co-Founder
EcoChef

Chef Christopher A. Galarza, Founder/CEO
Forward Dining Solutions

Gener, Board of Directors Chair
InGoodCompany

Chris Stratton
Affordable Housing Consultant

John & Sara Donnelly
Retired Economics Professor

Leane Eberhart, Architect
Self-Employee

Dave Clark, Consultant
San Mateo Heat Pump Advocates

Mark Hoffberg
Retired Physicist