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*Comment Received From: Rheem Manufacturing Company  
Submitted On: 6/28/2024  
Docket Number: 24-BSTD-01*

**Rheem Comments - 24-BSTD-01 Rheem Comments on 2025 Energy Code Rulemaking 15 Day Express Terms**

*Additional submitted attachment is included below.*



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June 28, 2024

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814  
Docket office, Ms-4  
Docket No. 24-BSTD-01  
*Submitted via e-Comment to [24-BSTD-01](#)*

**Re: Rheem comments in response to proposed changes for the 2025 Building Energy Efficiency Standards, Express Terms, 15-Day Language**

Dear Commissioners and CEC Staff,

Rheem Manufacturing Company (Rheem) appreciates the opportunity to comment on the 2025 Building Energy Efficiency Standards, Express Terms, 15-Day Language.

Rheem is an industry leader in total heating, cooling, refrigeration and water heating solutions and one of the few global brands with product offerings covering residential and commercial heating, cooling, conventional and hybrid storage water heaters (HPWH), tankless water heaters, solar water heating systems, pool and spa heaters, commercial boilers, residential hydronic and geothermal systems, commercial refrigeration products, indoor air quality accessories, and replacement parts for all categories. Rheem is headquartered in Atlanta, Georgia with manufacturing facilities in Oxnard, California, Alabama, Arkansas, Connecticut, and North Carolina in addition to distribution facilities throughout the US, Canada and the globe. We are committed to a clean energy future and continue to bring to market products that advance the goals of emissions reduction at an affordable price to homeowners and business owners, working cooperatively with environmental agencies and regulators.

**General Comments**

In our review of the 2025 Building Energy Efficiency Standards, Express Terms, 15-Day Language, we appreciate the changes made to the code language based on stakeholder input to the 45-Day Language and Rheem supports the CEC's activity to encourage heat pump space and water heaters in residential and nonresidential buildings. However, we urge CEC to preserve a greater degree of flexibility when selecting a mechanical system to use any energy source as primary or back-up when it is economically beneficial to do so while remaining in line with CEC's energy efficiency goals and request additional consideration of the language identified below to assist with understanding the code language and thereby aiding adoption.

**Nonresidential Occupancies—Mandatory Requirements**

**SECTION 140.4 – PRESCRIPTIVE REQUIREMENTS FOR SPACE CONDITIONING SYSTEMS**

Rheem strongly disagrees with the overly prescriptive requirements proposed for offices and schools using multi-zone systems, significantly limiting appropriate system choices by local



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system designers looking to make energy efficiency improvements in their projects. In the wake of input from many stakeholders with the same concerns, Rheem is disappointed with the minimal changes CEC has made to this section. Maintaining some degree of system flexibility for the specifier is critical to ensure comfort requirements are met without imposing undue burdens caused by prescriptively requiring multizone space-condition system types that are not widely installed today and unfamiliar to many HVAC professionals in the field.

Furthermore, Rheem recognizes that Section 140.4(a)3G was added to allow for the use of alternatives to the systems prescribed in Section 140.4(a) in response to multiple stakeholders' concerns. However, the processes for obtaining approval from the Executive Director through Exceptional Designs in §10-104 or Alternative Component Packages (ACPs) in §10-109(d) is difficult to distinguish from the performance method of compliance, imposes additional costs to school districts and businesses that are not adequately quantified and puts excessive burdens on the equipment specifier when designing for schools and offices. Rheem requests CEC consider adding system types to section 140.4 to improve the prescriptive requirements for multi-zone space conditioning systems in commercial applications.

#### Single-Family Residential Buildings

##### SECTION 150.0 — MANDATORY FEATURES AND DEVICES

Section 150.0(h)9 and 160.3(b)8 – Capacity variation with third-party thermostats in both sections contain language that states “the space conditioning system and thermostat together shall be capable of responding to heating and cooling loads by modulating system compressor speed”. We have received additional clarification that CEC’s intent with this language is to ensure the installer selects an appropriate thermostat for the space conditioning system during installation and does not intend to compel space conditioning systems manufacturers to make their systems compatible with all thermostats. We appreciate the clear response, but no changes have been made to the code language in these sections to clarify this intent. Rheem believes it would be beneficial to clearly communicate this within the code language in sections 150.0(h)9 and 160.3(b)8 to aid in proper adoption and field implementation.

Rheem would also like to note that while the language in 160.3(b)8 was updated to read “The installer shall certify on the Certificate of Installation that the control configuration has been tested in accordance with the **testing procedure found in the Certificate of Installation,**” the language in Section 150.0(h)9 still refers to “**the testing procedure found in the CF2R.**” Rheem requests clarity in both sections to identify the correct document that contains the pertinent testing procedure. Rheem believes CEC should consider compatibility with third-party thermostats holistically and should avoid near-term requirements that preclude long-term demand response goals.

#### Multi-Family Buildings

##### SECTION 160.3 – MANDATORY REQUIREMENTS FOR SPACE CONDITIONING SYSTEMS IN MULTIFAMILY BUILDINGS



Please refer to above comments for Section 150.0.

In summary, Rheem implores CEC to further improve the code language based on this feedback and thanks the CEC for their continued hard work and consideration of input to date.

Sincerely,

A handwritten signature in black ink that reads "Allison J. Skidd".

Allison J. Skidd  
Director, Global Regulatory Affairs – Air  
Rheem Manufacturing Company

CC: Nancy Grimm, Harshad Inamdar, Karen Meyers

