

DOCKETED	
Docket Number:	19-BSTD-09
Project Title:	Heat Pump Water Heater Demand Management Systems
TN #:	233800
Document Title:	Southern California Edison Company's Comments on the Revised JA-13
Description:	N/A
Filer:	System
Organization:	Southern California Edison Company
Submitter Role:	Public
Submission Date:	7/7/2020 6:38:04 PM
Docketed Date:	7/7/2020

*Comment Received From: Southern California Edison Company
Submitted On: 7/7/2020
Docket Number: 19-BSTD-09*

Southern California Edison Company's Comments on the Revised JA-13

Additional submitted attachment is included below.



Dawn Anaiscourt
Director, Regulatory Affairs
601 Van Ness Ave.
San Francisco, CA 94102

July 7, 2020

California Energy Commission
Docket Office, MS-4
Re: Docket No. 19-BSTD-09
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the Revised JA-13 – Heat Pump Water Heater Demand Management Specification

Dear Commissioners:

Southern California Edison (SCE) appreciates the opportunity to support the proposed JA-13 Heat Pump Water Heater (HPWH) Demand Management Specification, which outlines requirements for demonstrating load shifting capabilities in HPWH appliances.¹ As a proud, long-standing partner with the California Energy Commission (CEC) and our customers, we believe JA-13 will encourage the use of energy-efficient electric water heating technologies with demand-management features that will help meet California's decarbonization goals, reduce customer electricity bills, and contribute to grid harmonization efforts.

SCE supports the CEC moving as quickly as possible to an all-electric code, where feasible. Providing builders with more electrification compliance credits will encourage more all-electric new construction. JA-13 is an example of a compliance credit specification that will help accelerate the market adoption of HPWHs, by valuing their grid benefits when operated to shift load from peak to off-peak times. Furthermore, as residential customers transition to time-of use (TOU) rate structures, HPWHs with load shifting and demand-response capabilities may help TOU customers reduce their electricity bills and significantly lower their GHG emissions.²

SCE looks forward to continued support of HPWH market adoption through the following efforts:

- Implementation of load shifting HPWH incentive programs like California's Self Generation Incentive Program (SGIP)
- Supporting on-going development of the test and certification standards for Consumer Technology Association's CTA-2045, which is specified in the Northwest Energy Efficiency Alliance's Advanced Water Heating Specification version 7.0³

¹ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=233580&DocumentContentId=66125>

² [2019 Residential New Construction Cost Effectiveness Study](#), accessed at www.localenergycodes.com.

³ <https://neea.org/img/documents/Advanced-Water-Heating-Specification.pdf>

July 7, 2020

- Supporting the CEC as part of the statewide investor-owned utility Codes and Standards program in updating JA-13 in future code cycles as new HPWH technologies become available

Building electrification is an essential part of California's cleaner, healthier, and more equitable emissions-free future. SCE supports the CEC's proposed JA-13 specification for the 2019 iteration of Title 24. SCE looks forward to continuing to work with the CEC and other interested stakeholders through the various utility programs on which we collaborate. I am available to discuss these matters further at your convenience.

Sincerely,

/s/

Dawn Anaiscourt