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Submitted On: 10/20/2020
Docket Number: 19-BSTD-03*

Comments on CEC, Title 24 Workshop - October 6, 2020

On behalf of Bradford White Corporation (BWC), we would like to thank you for the opportunity to comment on the California Energy Commission's (CEC) proposed 2022 Building Energy Efficiency Standards on electrification. We are pleased to have a continued role in this important conversation.

BWC is an American-owned, full-line manufacturer of residential, commercial, and industrial products for water heating, space heating, combination heating, and water storage products. In the State of California, a significant number of individuals, families, and job providers rely on our products for their hot water and space heating needs.

BWC urges CEC to ensure Title 24 continues to be as fuel and technology neutral as possible, while promoting energy efficiency and retaining consumer choice. Doing so will continue to allow individuals, families, and job providers in California a healthy variety of options in space and water heating products that will meet their needs. We also feel it is important to continue allowing cost effective options, that still allow the state to move toward its energy efficiency goals. This is especially the case when considering the significant cost of living in the state, along with the many individuals who continue to recover from recent wildfires earlier this year.

We would urge CEC to exercise caution in considering the pursuit of electrification policies. A successful, and responsible, decarbonization program should include a mix of technologies and fuel sources, including electricity, that reduce the state's overall carbon emissions. We are concerned that moving toward electrification policies too quickly will create more unforeseen problems for Californians such as the type of grid capacity limitations the state experienced this past August. We suggest that CEC take more time to fully examine the potential impacts that such policies will have on the diverse building stock, and climate zones, throughout the state before modifying Title 24 to include aggressive electrification provisions.

BWC supports CEC's continued consideration of electric heat pump water heaters as an option. We believe these products are under-utilized in California, especially considering they have the added feature of being able to tie into an electric utility load management program. However, as CEC continues this process, we would urge that one technology is not subjected to additional requirements over another.

Thank you for including BWC and other stakeholders in this important conversation. We look forward to future discussions with both CEC and other stakeholders on this matter. Please let me know if you have any questions or would like any additional information.

Respectfully Submitted,



October 20, 2020

California Energy Commission
Docket Office, MS-4
Re: Docket No. 19-BSTD-03
1516 Ninth Street
Sacramento, CA 95814

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Respectfully Submitted,

Bradford White Corporation

Eric Truskoski
Senior Director of Government and Regulatory Affairs

Cc: B. Carnevale; M. Taylor; B. Hill; L. Prader; C. Sanborn; J. Ferrante; B. Wolfer; B. Ahee

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