

DOCKETED

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on January 26 Workshop on Heat Pump Baselines

Additional submitted attachment is included below.



Local Governments Empowering Our Communities

February 4, 2021

California Energy Commission
Dockets Office MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Submitted via Docket No. 19-BSTD-03, 2022 Energy Code Pre-Rulemaking

Re: Comments on January 26 Workshop on Heat Pump Baselines

Dear Commissioners and Staff,

The San Francisco Bay Area Regional Energy Network (BayREN) Codes and Standards Program is pleased to submit these comments and recommendations as part of the pre-rulemaking process for the 2022 Building Energy Efficiency Standards. BayREN is a collaboration of the Association of Bay Area Governments (ABAG) and the nine Bay Area counties, and BayREN's Codes and Standards Program works to save energy by improving compliance with Title 24 Parts 6 and 11, and by supporting and encouraging local energy policies such as reach codes. We work closely with local government staff from building departments and sustainability offices in particular.

We appreciate all of the work that has occurred behind the scenes to develop proposals for this update to the Energy Code, and the many workshops and opportunities to comment. We especially appreciated hearing during the January 26 workshop that the CEC intends to move to an all-electric code in 2025 code cycles. Having this longer term view is helpful, both to the Codes & Standards Program and to local governments, so that we can start preparing now.

Local governments here in the San Francisco Bay Area are already demonstrating a desire to move to all-electric new construction, with about a third of our jurisdictions having already adopted reach codes that either require or encourage efficient all-electric construction and additional jurisdictions considering similar reach codes. Having building standards that facilitate efficient all-electric buildings is essential to these local efforts. Therefore, we ask that the CEC carefully assess whether moving back to a single baseline in the 2022 Energy Standards could potentially pose a challenge to all-electric buildings. If so, we suggest continuing to have independent baselines for electricity and natural gas, rather than moving to a single baseline.

Another trend we are seeing at the local level is an interest in reach codes that apply to existing buildings. Retrofitting existing buildings can be costly and is challenging in many ways. As a result, we ask that the CEC include provisions in the 2022 Energy Standards to expedite future retrofits, such as requiring new buildings to designate a location for a future heat pump water heater in an appropriate location with electrical and plumbing infrastructure.

Thank you for the opportunity to provide this input, and for your careful consideration of these comments. We look forward to continuing to be involved in these important issues.

Respectfully Submitted,



Karen Kristiansson
BayREN Codes & Standards Program Manager

Cc: Judy Roberson, CEC-BayREN Liaison