

DOCKETED

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*Comment Received From: Rohimah Moly
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AO Smith Comments - Workshop on Low-Rise Residential Heat Pump Baseline

Additional submitted attachment is included below.



February 11, 2021

Commissioner J. Andrew McAllister, Ph.D.
California Energy Commission
Dockets Office, MS-4
Re: Docket #: 19-BSTD-03
1516 Ninth Street
Sacramento, California 95814

Re: Comments Regarding the Heat Pump Baseline Proposed Changes to the 2022 Title 24 Code for Low-Rise Residential Buildings (Docket #: 19-BSTD-03)

Dear Commissioner McAllister and California Energy Commission Staff:

These comments are submitted by the A. O. Smith Corporation (“A. O. Smith”) in response to the heat pump baseline proposals being considered for the 2022 Title 24 Building Code presented at a staff workshop on January 26, 2021. In general, A. O. Smith supports the California Energy Commission’s (CEC) goal to increase the market penetration of heat pump water heaters in new construction, single-family residences. With this goal in mind, A. O. Smith believes the proposal for the 2022 Title 24 Building Code to use heat pump water heaters in the baseline for the performance modeling approach in certain climate zones will help further CEC’s goal.

A. O. Smith Corporation, with global headquarters in Milwaukee, Wisconsin, applies technology and energy-efficient solutions to products manufactured and marketed worldwide. Listed on the New York Stock Exchange (NYSE), the company is one of the world’s leading manufacturers of residential and commercial water heating equipment and boilers, as well as a manufacturer of water treatment and air purification products.

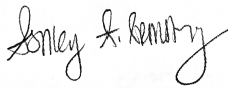
Heat Pump Water Heater Baseline

HPWHs are critical to enabling early adoption and market learning on electric water heating in new construction for single family homes in California. The CEC’s Title 24 2022 Baseline proposal will aid in enabling this early adoption, while sending a market signal emphasizing the importance of California’s decarbonization goals. In addition to implementing this Heat Pump Water Heater (HPWH) baseline in the select climate zones as proposed, A. O. Smith also emphasizes the importance of a meaningful compliance credit for HPWHs compliant with Joint Appendix 13 (JA13). This meaningful compliance credit must be complimentary to these measures and send a consistent signal about the importance of HPWHs and thermal energy storage across climate zones. As the CEC is aware, JA13 will represent the first HPWH

demand management specification that will enable HPWHs to either be controlled remotely, or simply respond to pre-loaded time-of-use price signals providing grid and utility benefits daily. By design, the specification provides high assurance that demand-flexible HPWHs will deliver daily load shifting over their lifetime, and that HPWHs can be used as thermal storage devices by utilities and warrants sufficient credit in the code to incentive its use.

A. O. Smith appreciates the opportunity to work with the CEC and, once again, is pleased with the work the Commission has done to continue to increase the market for HPWHs in new construction, single family residences. A. O. Smith stands ready to work with the CEC to help California further its policy goals. Please do not hesitate to contact us further if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ashley A. Armstrong". The signature is fluid and cursive, with the first name being the most prominent.

Ashley A. Armstrong
Director, Regulatory and Technology Policy
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