

**DOCKETED**

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*Comment Received From: Rheem Manufacturing  
Submitted On: 3/9/2021  
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**Rheem Comments on Title 24-2022 Express Terms**

*Additional submitted attachment is included below.*



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March 9, 2021

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814  
Docket office, Ms-4  
Docket No. 19-BSTD-03

**Re: Comments on the Pre-rulemaking Express Terms for the 2022 update to the California Energy Code (Title 24, Part 6)**

Dear Commissioners,

Rheem Manufacturing Company (Rheem) appreciates the opportunity to comment on the California Energy Commission's (CEC) 2022 Pre-Rulemaking Express Terms.

Rheem is an industry leader in total heating, cooling, refrigeration and water heating solutions, headquartered in Atlanta, Georgia and with a manufacturing facility in Oxnard, California. Rheem also has U.S. based manufacturing facilities in Alabama, Arkansas, Connecticut, and North Carolina and distribution facilities throughout the US, Canada and around the world. Rheem is committed to a clean energy future and continues to bring to market products that advance the goals of emissions reduction at an affordable price to the homeowner, working cooperatively with environmental agencies and regulators.

To reiterate previously submitted comments, Rheem supports CEC's market-based approach to transition Low Rise Residential buildings to electric heat pump technologies over two code cycles. As more work is needed to increase the electric equipment readiness, labor force training, and market adoption of heat pumps, a moderate step in the 2022 code is appropriate and is particularly critical for the most vulnerable consumers, many of whom rely on natural gas due to economic and infrastructure limitations.

Rheem is also generally supportive of moderate measures, such as heat pump-ready circuits, to support future conversion of gas appliances, and some of these measures should be applied to new buildings in the 2022 code. However, the Express Terms have a level of detail and prescription not shared in previous workshops, and while we are still reviewing all the changes made from CASE reports and workshop presentations, we are concerned about the numerous requirements of builders, such as pre-plumbed heat pump connections and reserved room space for heat pumps, which make it challenging and less cost efficient to install a gas or propane water heater or furnace for those who need it most. Incentivizing heat pumps and



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addressing market perception will serve better to drive adoption than to overprescribe electric-ready measures prior to the maturation of the heat pump market and installer community.

We thank the CEC for their continued hard work on the 2022 code and for emphasizing the key role heat pumps will play in achieving the state's building decarbonization goals, and we remain willing to collaborate with CEC on the remaining steps of the rulemaking.

Thank you for your consideration.

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

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

CC: Karen Meyers, Joe Boros

