

**DOCKETED**

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<b>Project Title:</b>	2025 Energy Code Pre-Rulemaking
<b>TN #:</b>	251544
<b>Document Title:</b>	350 Bay Area Action and 350 Contra Costa Action Comments - Heat Pump Baselines
<b>Description:</b>	N/A
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*Comment Received From: Gary Farber  
Submitted On: 8/9/2023  
Docket Number: 22-BSTD-01*

## **Heat Pump Baselines**

*Additional submitted attachment is included below.*



August 9, 2023

California Energy Commission  
Re: Docket No. 22-BSTD-01  
715 P Street, Sacramento, CA 95814  
docket@energy.ca.gov

Re: 2025 Energy Code Pre-Rulemaking – July 27 Staff Workshop: Heat Pump Baselines

Dear Commissioners,

350 Bay Area Action and 350 Contra Costa Action are non-profit organizations which advocate for laws and regulations to quickly address the climate crisis. We have reviewed the July 27 Staff Workshop presentation, and are thankful that the CEC is designing the 2025 Standards to expand where heat pumps are the baseline space heating system for nonresidential projects, and making heat pumps the baseline space heating and water heating systems for new residential projects.

The July 27 presentation document does not address space heating and water heating systems for residential alterations and additions. In the 2022 Standards, the Prescriptive new space heating and water heating systems for alterations and additions may be either heat pump or gas. Given the economic viability of heat pump systems, the climate crisis, and considering that the natural gas system may not be available over the life of new gas appliances<sup>1</sup>, we urge the CEC to adopt the following policies:

#### RESIDENTIAL ALTERATIONS & ADDITIONS

- Baseline (Prescriptive) new space heating systems: Heat Pump
- Baseline (Prescriptive) new domestic hot water systems: Heat Pump

Furthermore, the CEC may wish to include an exception for replacement space heating systems and replacement water heating systems, allowing such replacement systems to be either heat pump or gas. However, if such an exception is included, we urge the CEC to include in Title 24 Part 11 (CalGreen) an option where the Baseline system for replacement space heating and replacement water heating is heat pump. This would allow localities to adopt such a measure when they have programs in place to help residential property owners make the transition from gas to electric heating systems.

Please contact Gary Farber should you need any additional information.

Gary Farber, 350 Contra Costa Action [garyf8642@gmail.com](mailto:garyf8642@gmail.com)

Laura Neish, Executive Director, 350 Bay Area Action

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<sup>1</sup> PG&E is on record for wanting to abandon the natural gas system. See “Light goes out for some gas appliances”, S.F. Chronicle, March 16, 2023, p. A1.