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Lennox Comments - CEC Title 24-2025 Heat Pump Baseline Proposal

Additional submitted attachment is included below.



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September 7, 2023

California Energy Codes and Standards Team
California Energy Code (Title 24, Part 6)

Submitted via: CEC Docket 22-BSTD-01

Re: Lennox Comments regarding California Energy Code 2025 Pre-Rulemaking, Heat Pump Baselines

Lennox International Inc. (Lennox) hereby submits comments on the Codes and Standards Enhancement Proposal for the 2025 California Energy Code (Title 24, Part 6) regarding the Heat Pump Baseline Pre-Rulemaking Proposal.

Lennox is a leading provider of climate control solutions for the heating, air-conditioning, and refrigeration (HVACR) equipment markets based in the United States. Lennox is a publicly-traded company and has thousands of employees. Lennox manufactures HVACR products, equipment and control systems subject to California Energy Commission (CEC) requirements.

Lennox supports CEC's goals of improving energy efficiency exemplified by Lennox's tradition of innovation in the HVAC industry and consistent leadership regarding product efficiencies. Lennox offers the following comments on the Heat Pump Baseline Pre-Rulemaking Proposal.

A. General Comments.

California is clearly leading efforts to aggressively decarbonize and reduce emissions and the ongoing review and update of the California Energy Code (Title 24, Part 6) is a key component to support these objectives. Lennox generally supports the review and update of the code for the 2025 code cycle to further these objectives, but reiterates the Codes and Standards Team use caution to ensure the proposed measures yield meaningful results while not overly burdening California consumers and manufacturers of HVAC product with measures that increase cost and do not produce meaningful results.

B. Specific NOPR Issues on Which DOE Seeks Comment.

In addition to the above general comments, Lennox offers the following comments on the specific measure proposals. The comment period is a short two weeks from the stakeholder meeting held on August 24, 2023. Lennox may not be addressing each issue fully or other issue in the Code at this time but respectfully request the opportunity to further comment or engage with CEC staff directly as the Title 24-2025 Rulemaking process proceeds. In addition, in review of the CEC docket regarding the Final Case Report for the Heat Pump Baseline does not

appear to be available as yet which hinders the ability to fully evaluate the basis for the proposal conclusions. The comments below include the proposed measure topics followed by Lennox's response.

Single Family Heat Pump Baselines

Lennox supports the adoption of Heat Pumps for residential space heating and cooling to reduce energy consumption and reduce emissions, but consumer interest must also be considered to ensure cost effectiveness. The Single-Family proposal indicates continuing efforts for Part 6 new construction to transition to a Heat Pump baseline but does not present updated cost effectiveness information to support. In contrast the Part 11 – Voluntary for Single Family Alterations presented updated cost information resulting in several climate zones not being cost effective.

Lennox is not taking issue with the CEC general position to trend toward Heat Pumps in both new construction and replacement applications but would like to further review the Final Case Report and reserve the opportunity to comment or directly engage with CEC regarding once the Report becomes available.

Non-Residential Heat Pump Baselines

Lennox has concerns regarding the proposed baseline systems for the various Non-Residential building types. Lennox would like to further review the Final Case Report when available to further evaluate the methodology used to determine the selection of the baseline systems and comment accordingly when available. Docketed information such as that from Taylor Engineering (TN242681-20220214T182744) has questioned the validity of the evaluation and baseline selections and also questioned inputs used in modeling to determine these selections.

In addition, Lennox has further questions regarding key assumptions for Nonresidential Building Space Conditioning Alterations to RTU below 65 KBtu/h. The presentation indicated a difference in SEER between Heat Pump and DX/Gas (AC) systems where 14 SEER was used for Heat Pumps while DX/Gas used 13 SEER. The DOE standards for single package AC and Heat Pumps for SEER are the same for these products. See 10 CFR 430.32 [eCFR :: 10 CFR 430.32 -- Energy and water conservation standards and their compliance dates](#). Lennox is not disputing that a Heat Pump baseline for these products may be appropriate but again would like to more thoroughly review the inputs to ensure the conclusions are valid.

In summary, Lennox appreciates the opportunity to provide input on the CEC Pre-Rulemaking proposal. As noted Lennox would like to further analyze the Pre-Rulemaking proposal in its entirety and provide further input or discuss with the CEC directly regarding.

Sincerely,



Dave Winningham,
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