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Docket Number: 22-BSTD-01

Fujitsu, Daikin, and LG Electronics Title 24 Comments

Additional submitted attachment is included below.



AIRSTAGE



LG



October 5, 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 – Equipment Manufacturers Support Requiring Retrofit of Residential Air Conditioning (“AC”) Units with Heat Pumps in Part 6 of 2025 Building Code

Dear Commissioners and CEC Staff,

The undersigned equipment manufacturers appreciate the opportunity to comment on the California Energy Commission’s (“CEC”) 2025 Title 24 Building Energy Efficiency Standards (“2025 Building Code”) pre-rulemaking process. The 2025 Building Code is a critical opportunity to support California’s efforts to decarbonize buildings and help California achieve Governor Newsom’s target of installing six million heat pumps by 2030. Heat pumps are ready for mass deployment because they can do both heating and cooling and are cost-competitive when compared to other options. We recognize that heat pumps will be a pivotal technology to achieve energy efficiency, building decarbonization, and leveraging increasingly clean electricity.

Achieving the six million heat pump target will require a significant increase in market scale, a rapid shift towards clean heating technologies, and transparent clear market signals from policies like the 2025 Building Code toward heat pumps. We appreciate staff’s work on the pre-rulemaking proposal and look forward to continued conversations regarding the final 2025 Building Code. For these reasons, based on our experience with the heat pump market in California, we support the CEC’s proposed inclusion of both heat pump space and water heating as the new construction baseline in single- and multi-family and the expansion of the space heating new construction baselines to larger nonresidential buildings. We also support the proposed requirements that gas-fired single-zone rooftop cooling units in existing buildings be replaced with heat pumps when equipment is changed.

Additionally, we support moving the proposal to require the retrofit of residential AC units with heat pumps from part 11 to part 6 of the code. As heat pumps flood the California market, we believe by 2026 it will make both economic and policy sense for residential households seeking an AC replacement to shift to a heat pump. Heat pumps and air conditioners are made on largely similar assembly lines, yet more than twice as many central

and ductless air conditioners are installed in California each year as air-source heat pumps. The marketplace can support this simple transition away from one-way air conditioners on a statewide scale.

Furthermore, with the market on track to support this transition, we prefer a statewide approach over the current voluntary proposal in CalGreen. A voluntary pathway will only encourage a patchwork, city-by-city approach that will increase the cost and logistical difficulty of the transition to heat pumps for manufacturers, wholesalers, contractors, and consumers alike.

We appreciate staff's engagement on this topic and look forward to continuing to engage on the Title 24 rulemaking process.

Sincerely,

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