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Re 2025 Energy Code Pre-Rulemaking â€“ Energy Code Heat Pump Baselines and Retrofit Proposal

Additional submitted attachment is included below.

October 18, 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 – Energy Code Heat Pump Baselines and Retrofit Proposal

Dear Commissioners:

The undersigned community, environmental justice, climate, and environmental groups are writing to urge the California Energy Commission (CEC) to leverage its 2025 building code to support the closure of Aliso Canyon, site of the disastrous 2015 leak.

Eight years after the worst gas blowout in U.S. history, communities in the San Fernando Valley still live in daily fear of the fossil fuel infrastructure in their backyards. The Aliso Canyon gas storage facility is not safe and cannot be made safe. Another gas blowout at the facility would be catastrophic, especially for Aliso survivors already living with lasting health impacts from exposure to cancer-causing chemicals.

It's past time for California officials to prioritize the health and safety of communities by shutting down Aliso once and for all. Gov. Gavin Newsom told reporters in 2019 that he was working to "fast-track" closure. Not only is the site still operational today, but Newsom-appointed commissioners at the California Public Utilities Commission (CPUC) voted last month to increase gas storage capacity limits. Pumping more gas into Aliso increases the risk of another major leak.

The CEC has a significant opportunity to support the reduction of peak winter gas demand in the Southern California area that is necessary to close Aliso through their 2025 building code update. By ensuring that traditional air conditioning units that burn out are replaced with heat

pumps – which provide both heating and cooling – the CEC can cost-effectively provide households with an alternate heating technology to the gas furnace, lowering gas demand in Southern California. This is just one of many electrification upgrades that can pave the way for Aliso Canyon's closure and the CPUC, CEC and relevant agencies should leverage all solutions on the table to fast-track closure.

According to an analysis from NRDC, 35% of CA's 5.5 million residential AC units are more than 14 years old, meaning they are approaching burnout. Without action from the CEC, the vast majority of the units are likely to be replaced with traditional central AC, a major missed opportunity to dramatically accelerate the transition to heat pumps in homes.

If every Californian shopping for an AC unit instead bought a highly-efficient heat pump, California could electrify space heating in more than half of homes by 2030, compared to just 19% of homes given our state's current trajectory, according to a recent report from the Building Decarbonization Coalition.

Upgrading to heat pumps, rather than central AC, will benefit households economically in the long run – the problem is many California households in the market for cooling aren't aware they are an option. Households that install heat pumps with both heating and cooling capacity won't have to replace their gas furnace when it burns out, saving thousands of dollars in technology costs.

Heat pumps also deliver some of the most efficient heating and cooling on the market. Heat pumps can reach 400% efficiency, meaning for every unit of electricity it consumes to operate, it can provide four times that amount of heat energy. They are also a suitable technology to provide heating all across California, even in the coldest climate zones. According to new research from Oxford University, heat pumps are more than twice as efficient as fossil fuel heating systems in cold temperatures.

In addition to the economic benefits, ensuring central AC systems that burn out are replaced with heat pumps will also deliver substantial climate and air quality co-benefits. Installing a heat pump cuts emissions from space heating by 72% in the first year compared to a gas furnace and 93% over the lifetime of the equipment. Heat pumps also cut dangerous air pollution: burning gas in homes generates four times as much lung-damaging nitrogen oxide (NOx) pollution in California as the state's power plants.

For eight long years, San Fernando Valley communities have pressured California policymakers to safeguard their safety by closing Aliso Canyon. With its 2025 building code, the CEC has a commonsense opportunity to lay the groundwork to deliver on Governor Newsom's promise to communities.

Sincerely,

Chirag Bhakta, California Director
Food & Water Watch

Matt Pakucko, President and Co Founder
Save Porter Ranch

Patty Glueck, Co-Founder
Aliso Moms Alliance

Andrew Krowne, President
Environmental Health Research Inc.

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350 Ventura County Climate Hub

Marcia Hanscom, Managing Director
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Robert Jan van de Hoek, Environmental Scientist
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Dee Fromm, Co-Founder
Coastal Lands Action Network

David Klein
System Change Not Climate Change