

**DOCKETED**

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*Comment Received From: Joseph Patty  
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## **Lodi Unified School district --Thoughts on Hybrid HVAC Units**

Dear Commissioners and CEC Staff,

Thank you for the opportunity to comment on Docket No. 22-BSTD-01 regarding the heat pump baselines in Title 24-2025.

Lodi Unified School District is located in the San Joaquin Valley and Title 24 changes directly effect our campuses and students. As you may know, some of our campuses are not brand new buildings and don't have the electrical requirements necessary to install electric heat pumps in our buildings. Heat pump alteration has a great impact on the electrical load of existing buildings. Current buildings' electrical infrastructure was sized with gas/electrical equipment. With HVAC equipment being the biggest portion of the electrical load calculation, there is a concern that utility upgrades will be required for most of the alteration projects. This would involve the Electrical Service Provider's engineering services which would be an additional cost to the School District and could delay the project easily 6-12 months. Upgrading the existing transformer brings a challenge to getting projects done in time, which is already challenging.

A large percentage of these students come from underserved communities and will be directly affected by this. An electrical upgrade could delay the project which directly impacts the learning of the students when we cannot cool or heat their classrooms. Our campuses require the ability to purchase a hybrid gas/electric heat pump. The gas stage of heating would only come on when the temperatures are extreme enough to call for it Maybe 14 days a year. From my knowledge that may be 2 weeks out of the year in total.

We greatly appreciate the California Energy Commission's commitment to sustainability and the future of our state.

Call me if you have any questions

Sincerely,

Joe Patty  
Maintenance and Operations Director  
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