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PG&E Comments RE 2025 Title 24 Express Terms

Additional submitted attachment is included below.



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California Energy Commission
Docket Number 22-BSTD-01
715 P Street
Sacramento, CA 95814

RE: Draft 2025 Energy Code Express Terms

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Energy Commission's (CEC) Draft 2025 Energy Code Express Terms (Express Terms) docketed November 3rd, 2023.

PG&E continues to support the State's climate goals, including carbon neutrality no later than 2045. As California's largest energy provider, we embrace our foundational role in transitioning the state to a decarbonized and more climate-resilient economy. PG&E believes a multi-faceted approach is needed to cost-effectively achieve California's economy-wide greenhouse gas reduction objectives, including both strategic electrification and an orderly transition for the natural gas delivery system. In support of the transition, our climate goals include pursuing zonal electrification strategies and providing our hard-to-electrify customers with more sustainable gas supplies, including renewable natural gas and potentially hydrogen over the longer-term. As California's decarbonization policies evolve PG&E will continue to prioritize the safe and reliable operation of our electric and natural gas systems to continue supporting the customers that depend on us.

PG&E supports increases in Heating Seasonal Performance Factor 2 (HSPF2).

PG&E supports the CEC's approach to limiting envelope trade-offs, which impact peak cooling in Climate Zones 4 and 8-15 for new construction single family buildings, through increases in Heating Seasonal Performance Factor 2 (HSPF2). As we transition to heat pumps for space heating, California will need buildings that are designed to limit thermal loads during both the heating and cooling season.

PG&E asks that the CEC revise Section 150.2(b)1FiiA to preclude new furnaces in certain scenarios.

In the current Express Terms, the new proposed Section 150.2(b)1FiiA allows for new dual fuel heat pumps to be installed in existing dwellings where there may not have been an existing gas heating appliance before. PG&E believes this is not the intent of this new section as it seems to target air conditioner and gas furnace combinations where the air conditioner is being replaced with a heat pump and the gas furnace can remain as a supplemental heating source.

PG&E asks that the CEC revise Section 150.2(b)1FiiA to not allow newly installed dual fuel heat pumps in existing dwellings that don't have an existing forced air centrally ducted gas heating appliance. Example language may include:

- ii. When an air conditioner is altered or newly installed in an existing dwelling unit, the system shall comply with the following requirements:
 - A. A heat pump as the primary heating source and sized to meet the greater of heating or cooling load. Supplemental heating may be provided by ~~a new or an~~ existing gas furnace or by electric resistance; or

Also, PG&E believes that Exception 1 to Section 150.2(b)1FiiA should not apply to newly installed heat pump systems in buildings that don't currently have an air conditioner. In this scenario the homeowner is consciously choosing to purchase and upgrade their space conditioning system which includes the responsibility of necessary electrical upgrades. PG&E asks that the exception be revised to exclude newly installed heat pumps where the existing building did not have an air conditioner. Example language may include:

Exception 1 to Section 150.2(b)1Fii: Compliance with Section 150.1(c)6 is not required if the addition of the heat pump ~~is replacing an existing air conditioner and the heat pump~~ exceeds the existing main service panel capacity according to the requirements of California Electrical Code Article 220.83 or 220.87 Documentation of electrical load calculations in accordance with Article 220 must be submitted to the Authority Having Jurisdiction for both the heat pump and proposed air conditioner.

Recently the US Department of Energy has estimated the median lifetime of non-weatherized gas furnaces to be 21.4 years¹; therefore, missing a decarbonization opportunity at the time of an air conditioner replacement could lead to underutilized gas assets and jeopardize the carbon neutrality goal of 2045. In both Section 150.2(b)1FiiA and in Exception 1 to Section 150.2(b)1Fii, PG&E asks that new gas furnaces not be a means of compliance with the 2025 Energy Code.

PG&E appreciates the opportunity to comment on the Draft 2025 Energy Code Express Terms and looks forward to continuing to collaborate with the CEC. Please reach out to me if you have any questions.

Sincerely,

Josh Harmon
State Agency Relations

¹ U.S. Department of Energy, 2022-06 Technical Support Document: Energy Efficiency Program for Consumer Products and Commercial and Industrial Equipment: Consumer Furnaces, June 2022.
<https://www.regulations.gov/document/EERE-2014-BT-STD-0031-0320>