

**DOCKETED**

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### **Remove the proposed heat pump baselines in 1404(a)3**

We urge the CEC to remove the proposed heat pump baselines in 140.4(a)3. The new change to require offices to use VRF + DOAS is more expensive, less efficient, and could make buildings more likely to be flammable than a double duct VAV system. It seems like if we want to design offices the way that we have been doing so far with VAV's, it will require an energy model to prove that it is more efficient than the required VRF + DOAS system which is not an good use of time or money. The VRF system would require refrigerant to be flowing throughout the building and the new refrigerant, R32 is known to be flammable which could result in buildings to be more likely to be a safety hazard. For these reasons, I urge the CEC to remove the proposed heat pump baseline.