

**DOCKETED**

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*Comment Received From: David Clark*  
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## **Support Sierra Club's position 2025 Draft Building Code**

I head up San Mateo Heat Pump Advocates, a neighborhood group with 180 members. Our leadership team has been following this matter completely. We support the Sierra Clubs position on the replacing key language in the 45-day provision.

#--- Sierra Club talking points

We strongly support critical advances to the Building Code in the 45-day language that further building decarbonization, including expanded heat pump baselines for new construction in residential and commercial buildings and provisions that strongly encourage replacement of single-zone packaged rooftop units used in commercial buildings with heat pumps. Taken together, these measures will help ensure emissions-free heating and cooling in California's new buildings and begin to make in-roads into decarbonizing existing commercial buildings.

However, with California behind in meeting its climate objectives, it is incumbent on the CEC to ensure the 2025 Building Code realizes its full potential in reducing fossil fuel dependency in buildings. We are therefore concerned that the 45-Day Language eliminates key provisions from the earlier draft that would accelerate heat pump deployment and their corresponding climate, air quality and public health benefits in existing homes. Notably, the current draft omits prescriptive requirements that would encourage households statewide to install two-way heat pumps when replacing old air conditioning (AC) units. Due to their similar installation requirements, replacing central AC units with a heat pump is a low-cost intervention that protects against gas price volatility, reduces fossil fuel dependency, improves air quality and public health, and avoids the need for future gas.

Moreover, including AC to heat pump replacement provisions in the Building Code are necessary to lay the groundwork for successful implementation of Air District and California Air Resources Board (CARB) zero-emission appliance standards. Because heat pumps provide both heating and cooling, restoring proposed provisions that require heat pump installation at the time of AC replacement provide a zero-emission heating source that avoids the future need to install a heat pump at the time of furnace replacement. Accordingly, we ask that the CEC prescriptively require new and full replacement residential air conditioning systems installed in major alterations be heat pumps as part of the 2025 Building Code. At a minimum, the CEC should prescriptively require heat pumps when the A/C replacement also includes replacement of ductwork and commit to revisiting heat pump replacement for routine A/C replacements in a mid-cycle review.