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*Comment Received From: South Coast Air Quality Management District
Submitted On: 5/10/2024
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Comments on 2025 Building Energy Efficiency Standards, 45-Day Language

Additional submitted attachment is included below.



South Coast Air Quality Management District

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Office of the Executive Officer
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May 10, 2024

California Energy Commission
Re: Docket No. 24-BSTD-01
715 P Street
Sacramento, CA 95814
docket@energy.ca.gov

Re: Comments on 2025 Building Energy Efficiency Standards, 45-Day Language

Dear Commissioners,

The South Coast Air Quality Management District (South Coast AQMD) appreciates the opportunity to submit comments on the California Energy Commission's (CEC) 45-Day Language Express Terms for the 2025 Title 24 Building Energy Efficiency Standards (2025 Building Code) published March 28, 2024, and supports the CEC's work in developing the 2025 Building Code, which will assist the South Coast AQMD in achieving the National Ambient Air Quality Standards for ozone and particulate matter.

South Coast AQMD is the local air pollution control agency for the four-county region that includes Orange County and portions of Los Angeles, San Bernardino, and Riverside Counties. Our air district is the largest of the 35 local air agencies in California and encompass almost 11,000 square miles and 17 million residents. Our region has the worst air quality in the nation, and we are obligated to adopt all feasible measures, which includes zero NOx-emission standards, to achieve federal air quality standards.

The 2022 Air Quality Management Plan (AQMP) was adopted by our Governing Board on December 2, 2022. The 2022 AQMP includes specific control measures which seek further NOx emission reductions from commercial and residential building space and water heating appliances. The control strategy focuses on a combination of regulatory and incentives with an emphasis on replacing existing space and water heaters with new zero-emission technologies. Staff is currently developing rules to transition space and water heating to zero-emission technologies that will be considered for adoption by our Governing Board this year.

The CEC's 2025 Building Code has the ability to strengthen the work currently being done by air districts in California, such as aligning our zero-emission building appliance implementation dates with the effective dates in the building code. However, the building code also has the ability to drive early deployment of zero-emission technologies that will improve air quality and generate public health benefits.

As such, the South Coast AQMD requests that the CEC include in the final version of the building code two provisions found in the draft version of the 2025 Building Code that have since been removed. Specifically, the provision that required air conditioners in existing homes to be replaced with heat pumps. As heat pumps are essentially air conditioning units that can also provide heated air, heat pump installation at the time of air conditioning replacement will support early deployment of zero-emission technologies. It will also eliminate stranded assets from those homes needing to replace the space heating unit with a heat pump in future years following the air conditioning replacement. In a region where approximately 87 percent of homes have air conditioning units, the inclusion of this provision will assist greatly in air pollution reduction sooner, as well as the overall fiscal benefits to the population.

Retaining the provision that would have required the use of solar and heat pumps for pool heating in existing non-residential and multi-family buildings would result in substantial emission reductions. Currently, the South Coast AQMD has proposed zero emissions limit on pool heaters under Proposed Amended Rule 1146.2 - Control of Oxides of Nitrogen from Large Water Heaters, Small Boilers and Process Heaters (PAR 1146.2) that could be met with the operation of heat pumps or solar technology. We estimate that there are approximately 700,000 pool heaters in our region. A transition to zero-emission heat pumps will result in substantial emission reductions.

Establishing building code requirements to transition to zero-emission technologies, such as heat pumps, aligns with the South Coast AQMD's regulatory approach and consistency amongst regulatory agencies but also sends a strong market signal and promotes certainty for appliance manufacturers, homeowners, and our local businesses. Including these two provisions back into the final 2025 Building Code would enhance the progress necessary for the state and regions to meet their air quality standards and achieve public health benefits. Thank you for considering our comments.

If you have any questions or would like to discuss these issues, please contact me at 909-396-3131, wnastri@aqmd.gov, Dr. Sarah Rees, Deputy Executive Officer, Planning, Rule Development and Implementation, at 909-396-2239, srees@aqmd.gov, or Barbara Baird, Chief Deputy Counsel, at 909-396-2302, bbaird@aqmd.gov.

Sincerely,



Wayne Nastri
Executive Officer

cc (email): Susan Nakamura, South Coast AQMD
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