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2025 Energy Code Rulemaking - Proposed changes to baseline HVAC Systems

Additional submitted attachment is included below.

May 13, 2024

David Hochschild
California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: 2025 CA Energy Code Rulemaking

Docket Number: 24-BSTD-01

Dear California Energy Commission,

Established in 1967 and stretching across six offices on the West Coast – from Seattle to Los Angeles – PAE is a 350-person firm providing services in mechanical, electrical, and plumbing engineering, building performance analysis, technology, and lighting design services. We work with clients to design the nation's highest performing and most regenerative built environments that keep people comfortable, healthy, and productive inside while restoring the natural world outside.

PAE fully supports the decarbonization of building systems and recognizes the need to update the Energy codes to address all electric HVAC systems. Unfortunately, the proposed changes to the office and school prescriptive baseline systems around VRF + DOAS and FPFC + DOAS with air to water heat pumps are a radical shift from the previous packaged VAV and VAV reheat systems, that would have a severe first and operational costs impact on projects. PAE understands that the performance path would still be available, but it imposes time and cost constraints on projects and should not be the only method required to demonstrate code compliance.

The supporting evidence to these drastic changes provided by the CEC is clearly lacking as highlighted by the other public comments from the industry, including the ASHRAE President. We hope that the California Energy Commission will listen and consider the concerns expressed by the experts in the field and that the proposed changes to the baseline systems be postponed until in depth and verified analyses have been conducted and further clarifications have been provided.

Sincerely,

Moana Reynau, PE, LEED AP
ASSOCIATE PRINCIPAL

PAE

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