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Office and School Prescriptive HVAC System Types

I strongly suggest that the CEC remove the proposed heat pump baselines in 140.4(a)3. These changes would greatly restrict the ability for design engineers and building owners to select the proper HVAC systems for their buildings without the use of a costly energy model. Additionally, this would require energy efficient systems such as systems with economizers to have an energy model to comply.

While I agree with the CEC's intent to decarbonize, this is not the proper way to execute this. Additional review of different types of all electric systems need to be considered in the code.

Please consider removing this requirement from the 2025 Energy Code.