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ADUs and HWHPs within 2025 Energy code rule making

Comment re ADUs and HWHPs 2025 Energy code rule making.

Greetings - It is good have an opportunity to be heard by you.

I am writing to ask you to leave space in your rule making for those of us who choose to use less as the starting point of energy related best practices.

Specific case in point:

As an extremely/very low income owner builder I find I fall between the cracks in both rules and rebates. I am creating an ADU by adding a bath kitchenette to an existing studio bedroom off the garage.

I am going forward as my budget allows, without a mortgage. It is slow. It is small. It is, as much as possible, appropriate to the setting. Of prime importance to me is that it has a light touch on the earth as far as the use of resources in creation, maintenance and ongoing use are concerned.

I plan to use a 12 gallon resistance electric storage water heater, because the cost of a similar sized HWHP unit is over 2,500 plus shipping costs from Japan. They are nice. They are beyond my budget. Perhaps they are not necessary, or even desirable, for me.

In my planning, 12 gallons works perfectly, based on DOE's "size your water heater" tool, which is a good tool. Any showers will have to be either EXTREMELY short, or be at least 1 hour apart. That has not been a problem in my household for over 50 years. No washing clothes with hot water, or if so, then wait for a shower. I wash with hot less than once a year.

The hot water will exit the heater less than 18 inches from where it enters the kitchen sink fixture at deck height. It will sit under the sink, on a fully insulated internal slab, and will contribute some warmth to the new ADU kitchenette. Additionally, there is no venting required, thus no air loss from the room. All the hot water runs for the new bath and kitchenette are designed to be very short.

Even if I were to wait, to take advantage of eventual rebates that are likely to cover the cost of the HWHP for folks in my income bracket, there is no space in the rules for a 40-50 gallon water heater, no need for a 40-50 gallon heater, and no desire for a 40-50 gallon heater. These are the only sizes that seem to be considered in current programs and regulations.

I am writing to ask you to leave space in your rule making for those of us who choose to use less as the starting point of living lightly on the earth.

Thank you.

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owner-builder-designer