City of ARCATA

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California Energy Commission
DOCKETED
15-BSTD-01
TN # 75629
APR 15 2015

March 24, 2015

California Energy Commission
Dockets Office – Docket: 15-BSTD-01
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

RE: Draft 2016 Building Energy Efficiency Standards Docket: 15-BSTD-01

Dear Chairman Weisenmiller:

The City of Arcata has been working for years toward goals of energy sustainability, energy independence, and climate neutrality. One key area is the promotion of alternative fuels that do not rely on petroleum or natural gas, but can instead utilize local energy resources, such as locally generated electricity. Statewide studies indicate that substantial electrification of both the transportation sector and the building sector will be necessary for California to achieve the state-wide emissions reduction targets. Even with the current source mix for electricity there is a substantial greenhouse gas emission reduction benefit through appropriate heat pump installation/conversion.

Arcata's General Plan calls for "reducing the net emissions of greenhouse gases from Arcata and encouraging appropriate energy alternatives" and the City's Community Greenhouse Gas Reduction Plan calls for support of "land use regulations and building codes designed to encourage energy efficiency . . . include[ing] heating systems . . . among others."

In support of these goals the City urges the California Energy Commission through the 2016 Building Energy Efficiency Standards Title 24 Energy Code update to develop standards that support electric heat pumps for space and water heating. Specifically we request that the CEC consider:

1. Encouraging residents to replace natural gas-fueled water heaters with energy efficient electric heat pump water heaters (HPWH)by eliminating the current California Title 24 Building Code requirement that each individual customer that makes this switch must undertake a modeling effort to prove that the switch from natural gas to electricity 'uses no more energy' (code section 150.2(b)2). This places an unreasonable barrier for our citizens to convert from natural gas heaters.

2. Allow for the installation of heat pump water heaters (HPWH) in new construction without penalty, even when natural gas is available.

3. Work with the heat pump manufacturers to develop standards that accurately report the efficiency of heat pumps. Currently many of the efficiency standards are set artificially at the Federal minimum standard vs. via an accurate model of their efficiency.

Phasing in "fuel switching" from natural gas to carbon-neutral electricity will have an immediate and long term positive impact on the environment. As the electric grid increases its carbon free and renewable portfolio the benefits from heat pumps also increases. Delaying action now will lock us into long lived natural gas appliances and dependency on a high carbon emission fuel source. We appreciate your attention to this important energy matter.

Sincerely,

Michael Winkler

Michael Winkler
Mayor

MW:kn
cc: Mike McGuire, State Senator, District 2
Pierre Delforge, Natural Resources Defense Council