

Hon. Steven S. Cliff, Ph.D.
Executive Officer
California Air Resources Board
1001 "I" Street
Sacramento, California 95814

RE: California Public Workshop: Zero-Emission Space and Water Heaters

Dear Dr. Cliff,

California has set an ambitious goal of achieving carbon neutrality by 2045, necessitating collaboration and strategic implementation across all sectors within the state. The California Air Resources Board's (CARB) zero-emission regulatory proposal focusing on new sales requirements for space and water heating equipment represents a significant step towards attaining the 2045 carbon neutrality goal. Therefore, Southern California Edison (SCE) commends CARB for its substantial efforts in developing the proposed zero-emission requirements, facilitated by robust public engagements, various workshops, and consultation and collaboration with other state agencies and subject matter experts.

Southern California Edison (SCE) appreciates the opportunity to provide comments on the Zero-Emission Space and Water Heater Standards Public Workshop (Workshop), held on May 29, 2024, by the California Air Resources Board (CARB).

1. SCE Supports Regulatory Option B ("Refined Concept B")

SCE supports Regulatory Option B ("Refined Concept B"), which proposes staggered compliance dates based on technological feasibility. Achieving an equitable yet expeditious transition to carbon neutrality by 2045 presents numerous implementation challenges. SCE believes that staggered compliance dates offer a sensible approach to mitigate these challenges, including ensuring equitable distribution of resources in low-income populations, disadvantaged communities, and hard-to-reach areas. We urge CARB to align these compliance dates with those of the Bay Area Air Quality Management District (BAAQMD) and the South Coast Air Quality Management District (SCAQMD) to minimize market confusion and compliance ambiguity.

2. SCE Urges CARB to Establish Effective Dates Based on Installation Date

SCE recommends that CARB avoid using the manufactured date as the basis for effective dates. The manufactured date may be a sensible effective date when applied universally across states. But given CARB's compliance date applies to California, SCE suggests that CARB consider a phased schedule with compliance dates of installation as the basis for the effective dates. This approach could prevent the potential issue of unsold out-of-state equipment being installed, which may delay the intended air emission reductions by up to two years, depending on the manufacturers' inventory levels.

As an example, SCAQMD recently updated and approved Rule 1146.2, which established installation dates as effective dates as opposed to using the manufactured dates. Consequently, installation of small commercial water heaters after the effective date would not comply with Rule 1146.2. Therefore, SCE urges CARB to establish the effective date based on installation dates, not based on manufactured dates.

3. SCE Recommends that CARB Collaborate with the BAAQMD and the SCAQMD on Exemption Criteria

Implementation barriers or challenges, such as those between rural and under-resourced areas, and demonstrated "infeasibility," are critical considerations for establishing exemptions. To ensure enforceability and consistency statewide, these exemptions must be developed in collaboration with regional stakeholders. Therefore, SCE recommends that CARB collaborate and seek to align with the BAAQMD and SCAQMD in establishing such exemptions to the proposed rules.

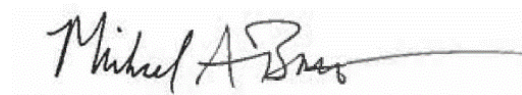
4. SCE Will Continue to Provide CARB with Relevant Technical Studies and Data

SCE has actively participated in various field demonstrations, pilot programs, and incentive initiatives in collaboration with national laboratories, professional organizations, and statewide implementers. SCE remains committed to sharing pertinent findings, studies, and data with CARB, particularly regarding emerging technologies such as 120V and high-temperature heat pump water heaters, as they become available. For instance, the California Public Utilities Commission is revising the useful life (EUL) of heat pump water heaters and HVAC systems, and draft results based on recent studies demonstrate that the updated EUL is substantially longer than the current value for Energy Efficiency programs. Simultaneously, the EUL of some of the gas water heaters may be reduced. These revised values are a key factor for CARB's economic analysis, particularly for equity considerations. SCE urges the consideration of this data for the economic and environmental analysis.

Conclusion

SCE thanks CARB for taking into consideration the above comments on the Zero - Emission Space and Water Heater Standards Workshop and we look forward to working with CARB and stakeholders throughout this process. Please do not hesitate to contact me at (626) 302-8442 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Sincerely,



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