

TITLE 24, PART 6 2025 CODE CYCLE

Residential HVAC Performance

Codes and Standards Enhancement (CASE) Proposal SF and MF HVAC Performance

Kristin Heinemeier January 24th, 2023



Speaker Introduction



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With contributions from:

- Abram Conant
- Marshall Hunt
- Russ King
- Mike McFarland
- Jon McHugh
- Dave Springer
- Parker Wall
- ...among others!

Agenda

| Background, Market Overview and Analysis, Technical Feasibility | 20 min |
|--|--------|
| Design (Load Calc, System Selection) and Supplementary Heating | 20 min |
| Discussion | 15 min |
| Defrost and Crankcase Heating | 20 min |
| Discussion | 15 min |
| Break | 15 min |
| Refrigerant Charge Verification and Variable Speed/Zoned Systems | 20 min |
| Discussion | 15 min |
| Cost / Energy Impacts and Compliance / Enforcement | 20 min |
| Discussion | 15 min |
| General Discussion and Next Steps | 20 min |

Residential HVAC Performance Measures

- Design (Load Calculation and System Selection)
- Supplementary Heating
- Defrost
- Crankcase Heating
- Refrigerant Charge Verification
- Variable Capacity / Zoned Systems

Including HVAC systems for both Single Family and Multi-Family Residences, and not including Heat Pump Baseline i.e. not "Should I put in a heat pump?" but **"How can I make sure my heat pump performs?"**

i.e. not "Should I put in a heat pump?" but "How can I make sure my heat pump performs well?"



Design (Load Calculation and System Selection)

- Background
- Market Overview
- Technical Considerations

Design: Background

Sizing is important for performance, particularly for heat pumps which require a careful **balance** between:

- Oversizing inefficient, uncomfortable and
- Undersizing excessive operation of strip heating, insufficient airflow to achieve whole dwelling comfort, lack of humidity control

Proposed Code Changes Would...

- Require sizing of systems according to ACCA Manuals J and S, with modifications
- Use Manual J design temperatures
- · Allow for simplified inputs in some cases
- Encourage infiltration measurement when installing a new system in an existing dwelling
- Make system selection more specific to CA climates and address sizing of heat pumps for both cooling and heating loads.
- Avoid "cascading" safety factors by removing some redundancies that lead to oversizing.
- Require more attention to design of ducts and diffusers to avoid drafts.

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- Add more strength to current requirements, by requiring sizing of systems according to ACCA Manuals J and S, with modifications
- Use Manual J design temperatures for load calculations
- Make it easier to calculate loads, by allowing for simplified inputs in some cases
- Make it more accurate, by encouraging infiltration measurement when installing a new system in an existing dwelling
- Make system selection more specific to California climates and address sizing of heat pumps for both cooling and heating loads.
- Avoid "cascading" safety factors by removing some redundancies that lead to oversizing.
- Require more attention to design of ducts and diffusers to avoid drafts.

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Impacts of Sizing

Research by NIST suggests:

In heating dominated climates:

· Capacity can be slightly under- or significantly oversized without much of a penalty.

In cooling dominated climates:

- Cooling capacity can be undersized without much of a penalty (especially if the ducts are oversized for the capacity, where there is actually a 7.5% benefit).
- Capacity can be oversized only if the ducts are correspondingly oversized (avoiding what would be a penalty of about 2.5% for every 10% the capacity is oversized).

Analysis of data from "Sensitivity Analysis of Installation Faults on Heat Pump Performance", Domanski, Henderson, and Payne, 2014. NIST Technical Note 1848.

Design: Current Code Requirements

- · Manual J or similar is required, but not verified
- Climate Data in JA2.2 to be used:
 - 1% for cooling
 - · Winter Median of Extremes for heating
- Manual S is required in Title 24, Part 11, but not verified



Load Calculation: Proposed Requirements

Mandatory: Manual J load calculation would be required.

- Design temperatures based on the <u>ASHRAE 2021</u> Reference Standard data, provided in a new JA2.2: California Design Location Data.
- Load calcs would use:
 - Heating design temperatures no lower than the <u>99% DB</u>
 - Cooling design temperatures no higher than 1% DB and MCWB.
- Simplifying Assumptions would be allowed for:
 - Like-for-like system replacements
 - Existing systems serving an addition that is less than 144 $\mbox{ft}^2.$
- Simplifying Assumptions not allowed for heat pumps with strip heating.

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ASHRAE - American Society of Heating Airconditioning and Air Conditioning Engineers California Design Location Data



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Load Calculation: Proposed Requirements

In existing homes, measurement of infiltration rates recommended.

Mandatory requirements when measured infiltration is <u>not</u> used:

- The Manual J infiltration value used in the calculations no worse than "Average".
- Would require disclosure that the system could be undersized and future infiltration reduction measures are recommended to improve comfort.

Mandatory requirements when measured infiltration <u>is</u> used:

- Manual J infiltration value no greater than measured infiltration.
- Infiltration test per RESNET protocols for existing homes.
- If measured CFM50 is greater than conditioned floor area, would require disclosure that the system size could have been reduced with very cost-effective infiltration reduction measures.

System Selection: Proposed Requirements

Mandatory: For heat pumps, installed equipment sized based on ACCA Manual S-2023, substituting the limits to the right.

Mandatory: Heating-only systems use Manual S-2023 Table N2.5.

Mandatory: Cooling-only systems subject to the Cooling limits to the right.

Exception: The single speed Max limits are waived if duct size is verified, per Verified Duct Design protocol. Note this means that in some highly cooling-dominated climate zones, Verified Duct Design will be mandatory.

Exception: The heating capacity can be lower if there is no available equipment that has a capacity that will meet the Manual J load.

Minimum Capacity:

• Heating Capacity ≥ Heating Load

Maximum Capacity:

Only where Total Cooling Load > Heating Load:

Single Speed:

- Cooling Capacity ≤ Cooling Load + 6,000 Btuh AND
- Heating Capacity ≤ Heating Load + 12,000 Btuh*

Minimum Load (Multi- or Variable-Speed):

- Cooling Capacity ≤ Cooling Load * 0.80 AND
- Heating Capacity ≤ Heating Load * 0.80

Comparison of System Selection Limits

Manual S-2014:

Manual S-2023 (proposed):

MIN

1 Speed C/L≥0.90

2 Speed

Variable

1 Speed

2 Speed

Variable

HIGH SPEED

LOW SPEED Sensible Cooling

MAX

| Cooling Dominated | Sensible Cooling | | Latent Cooling | | Total Cooling | | Heating | |
|-------------------|------------------|---------|----------------|--------|---------------|--------------|---------|------|
| CZs (6-15) | MIN | MAX | MIN | MAX | MIN | MAX | MIN | MAX |
| 1 Speed | | | | | C/L ≥ 0.9 | C/L ≤ 1.15 | | |
| 2 Speed | | | | | C/L ≥ 0.9 | C/L ≤ 1.2 | | |
| Variable | | | | | C/L ≥ 0.9 | C/L ≤ 1.3 | | |
| Heating Dominated | Sensible | Cooling | Latent C | ooling | Total | Cooling | Hea | ting |
| CZs (1-5, 16) | MIN | MAX | MIN | MAX | MIN | MAX | MIN | MAX |
| 1 Speed | | | | | C/L ≥ 0.9 | C ≤ L+15,000 | | |
| 2 Speed | | | | | C/L ≥ 0.9 | C ≤ L+15,000 | | |
| Variable | | | | | C/L ≥ 0.9 | C ≤ L+15.000 | | |

Latent Cooling

MAX

MIN

C/L ≥ 1.00

Title 24-2025 (proposed):

| Design Cooling Load > | | То | tal Cooling | Heating | | |
|-----------------------|-----------------------|-----|----------------|------------|-----------------|--|
| Desigr | Design Heating Load: | | MAX | MIN | MAX | |
| т О | 1 Speed | | C ≤ L + 6,000† | C/L≥1.00 | C ≤ L + 12,000† | |
| HIGH | 2 Speed | | | C/L ≥ 1.00 | | |
| - S | Variable | | | C/L ≥ 1.00 | | |
| ~ 0 | 1 Speed | | n/a | | n/a | |
| LOW | 2 Speed | | C/L ≤ 0.77 | | C/L ≤ 0.80 | |
| S I | Variable | | C/L ≤ 0.80 | | C/L ≤ 0.80 | |
| Desigr | Design Heating Load > | | tal Cooling | Heating | | |
| Desigr | n Cooling Load: | MIN | MAX | MIN | MAX | |
| т <u>О</u> | 1 Speed | | | C/L ≥ 1.00 | | |
| HIGH | 2 Speed | | | C/L ≥ 1.00 | | |
| - s | Variable | | | C/L≥1.00 | | |
| <u> </u> | 1 Speed | | | | | |
| LOW SPEED | 2 Speed | | | | | |
| SI L | Variable | | | | | |

C = Selected Total Cooling or Heating Capacity at the local design temperature.

L = Manual J Total Cooling or Heating Load at the local design temperature.

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Total Cooling

C/L≥0.90 C≤L+6,000

MAX

n/a

C/L ≤ 0.77

C/L ≤ 0.80

MIN

Heating

MAX

C/L ≤ 1.20

n/a

C/L ≤ 0.80

C/L≤0.80

MIN

C/L ≥ 1.00

Design Verification: Proposed Requirements

Mandatory: Propose requiring that designer submit on a CF1R to the local jurisdiction for plan review:

- Manual J and S Calculations
- A duct layout or room-by-room list of ducts and diffusers meeting [TBD] requirements of (based on ACCA Manuals D and T)
- A self-certification that air distribution design meets best practices, described in ACCA Manual T.

| Shoemaker 5 Titus 000 CFM M Make 0 Shoemaker 0 Shoemaker 00 CFM | 904 Model 920FG2 | 6x6 10x6 Size 20x30 20x20 | 2″ | 13' at <u>1</u> 5' at <u>1</u> 5' at <u>5</u> Net Free Area SF 3.0 2.0 | | <20 25 MERV 13 |
|---|---|---|--|--|---|--|
| 00 CFM M Make D Shoemaker D Shoemaker D0 CFM | Model 920FG2 | Size 20x30 | Depth 2" | Net Free Area SF 3.0 | Velocity 250 FPM | MER' 13 |
| M Make O Shoemaker O Shoemaker | 920FG2 | 20x30 | 2″ | 3.0 | 250 FPM | 13 |
| M Make O Shoemaker O Shoemaker | 920FG2 | 20x30 | 2″ | 3.0 | 250 FPM | 13 |
| 0 Shoemaker 0 Shoemaker 00 CFM | 920FG2 | 20x30 | 2″ | 3.0 | 250 FPM | 13 |
| 0 Shoemaker 0 Shoemaker 00 CFM | 920FG2 | 20x30 | 2″ | 3.0 | 250 FPM | 13 |
| 0 Shoemaker 00 CFM | | | - | | | |
| 00 CFM | 920FG2 | 20x20 | 2″ | 2.0 | 10E EDM | |
| | | | | | 1231 FIVI | 13 |
| ormed an accur wer door maxim | um CFM50 use nd cooling load | otal load o d and spe is and sel | calculation ecified for ected eq | on and room by roc | | limate |
| blished a total h | eating and coo | oling airflo | ow amou | int (# tons x 450 CF | M/Ton) | |
| ded total airflow | above (manua | ally or pro | gram) in | ito each habitable s | pace | |
| uniformity in de adequate room te occupant dra | e of the distrib uct resistance l air mixing fts pise by location | ution sys by central n (for exa | tem Ily locatii mple, no | one over pillows) | | |
| t | uniformity in du adequate room e occupant draf bjectionable no | uniformity in duct resistance la adequate room air mixing e occupant drafts bjectionable noise by location bjectionable noise by type (fo | uniformity in duct resistance by central adequate room air mixing e occupant drafts bjectionable noise by location (for exa bjectionable noise by type (for exampl | adequate room air mixing e occupant drafts bjectionable noise by location (for example, no bjectionable noise by type (for example sidewa | uniformity in duct resistance by centrally locating equipment adequate room air mixing | uniformity in duct resistance by centrally locating equipment adequate room air mixing e occupant drafts bjectionable noise by location (for example, none over pillows) bjectionable noise by type (for example sidewall vs curved blade) |

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Design: Market Overview and Analysis

Current Market

- Systems in all sizes are available
- Many contractors do not carry out sizing calculations



Market Trends

• Sizing calculations are probably done more consistently for new construction and production homes than for system replacement



Market Barriers

- Many contractors are not well prepared to do accurate sizing calcs (despite current requirement)
- Many contractors do not own Blower Doors and do not know how to do a test

Design: Technical Considerations

Technical Considerations

- Builders and contractors believe that undersizing can create comfort problems but overlook the comfort problems created by oversizing.
- When heat pumps are undersized, strip heating energy use can be excessive.
- As the market switches from furnaces to heat pumps, it is critical to do proper air distribution design to avoid drafts and improve comfort.

Technical Barriers and Potential Solutions

- Collecting inputs for load calculation is time consuming.
 - Could reduce this time by allowing simplification where outputs are not sensitive to input accuracy.
 - Time may be better spent measuring infiltration rates.
- More training will be needed

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More training will be needed for designers (proper load calculation, system selection, air distribution design), and installers (infiltration rate measurement).



Supplementary Heating

- Background
- Market Overview
- Technical Considerations

Supplementary Heating: Background

- Moving towards full electrification, electric resistance strip heating will become an unacceptable waste of energy.
- It can also be a major contributor to winter morning peak demand.
- With good design, most systems in California do not need supplementary heating.
- If systems do use supplementary heating, it needs to be carefully controlled.

Proposed Code Changes Would...

- Ensure that electric resistance strip heaters do not use an excessive amount of energy:
 - More attention paid to proper sizing when strip heating is used.
 - Controls to ensure strip heating does not run at milder temperatures, while still allowing operation during defrost (but see Defrost Measure about minimizing this).
 - Limit the size of strip heating
 - Similarly, ensure that dual-fuel systems use as little fossil fuels as possible.

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Proposed Code Changes Would...

Ensure that electric resistance strip heaters do not use an excessive amount of energy:

- Make sure that more attention is paid to proper sizing when strip heating is used.
- Add controls to ensure that strip heating does not run at milder temperatures, while still allowing operation during defrost (but see Defrost Measure about minimizing this).
- Limit the size of strip heating so that if they run too often, the waste will be minimized.

Similarly, ensure that dual-fuel systems use as little fossil fuels as possible.

Supplementary Heating: Current Code Requirements

110.2 MANDATORY REQUIREMENTS FOR SPACE-CONDITIONING EQUIPMENT

(b). Controls for Heat Pumps with Supplementary Electric Resistance Heaters

Heat pumps with supplementary electric resistance heaters shall have controls:

- 1. That prevent supplementary heater operation when the heating load can be met by the heat pump alone; and
- 2. In which the cut-on temperature for compression heating is higher than the cut-on temperature for supplementary heating, and the cut-off temperature for compression heating is higher than the cut-off temperature for supplementary heating.

Exception 1 to Section 110.2(b): The controls may allow supplementary heater operation during:

- A. Defrost; and
- B. Transient periods such as start-ups and following room thermostat setpoint advance, if the controls provide preferential rate control, intelligent recovery, staging, ramping or another control mechanism designed to preclude the unnecessary operation of supplementary heating.

Supplementary Heating: Proposed Requirements

Mandatory; If <u>Electric Resistance Strip Heat</u> is used, would require:

- Simplifying assumptions not allowed in Manual J inputs.
- For existing dwellings, infiltration testing required and the measurement used for Manual J inputs.
- Controls required that use either an outdoor air temperature sensor or an internet weather feed to lock out strip heating whenever the outdoor temperature exceeds 35°. Controls verified.

Exceptions: Supplementary heating can operate during defrost mode or emergency operation.

- Strip heating capacity limited to the maximum of:
 - The difference between the heat pump capacity and design load.
 - [TBD] kw per ton (for defrost).

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Mandatory; If <u>Dual Fuel</u> is used, would require:

Controls that lock out fossil fuel use whenever the outdoor temperature exceeds 35°F. Controls verified.

Exceptions:

Supplementary heating can operate during defrost mode or emergency operation.

Supplementary Heating: Market Overview and Analysis

Current Market

• Heat pumps in all sizes and cold-climate heat pumps that can provide sufficient heating without supplementary heating are readily available.



Market Trends

 Many contractors in California find that they do not need to install supplementary heating. (Currently estimating fraction through surveys).



Market Barriers

• It is much easier to install a small heat pump and assume that supplementary heating will make up any shortfalls, than to design the system optimally from the start.

Supplementary Heating: Technical Considerations

Technical Considerations

- A well-designed heat pump can provide sufficient heating in all but the most severe climate zones, in which case cold-climate heat pumps can be used.
- Avoiding supplementary heating would make the other performance measures proposed here even more important (eg sizing and air-distribution design).
- If a contractor or builder chooses to add supplementary heating, they would be required to ensure that the controls preclude wasteful operation and would be required to install compensatory measures to make up for performance shortfalls.



Technical Barriers and Potential Solutions

Training would be necessary for designing (sizing and airdistribution design) and for configuring controls.

Discussion: Sizing and Supplementary Heat

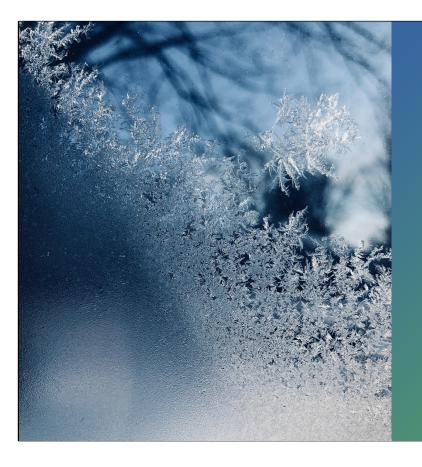
- What do we have wrong?
- What do we have right?
- How could we improve this?
- Do you have information or data that would help us?

Submit questions and comments using the Menti link. We will attempt to discuss these today. If we don't get to your question, we will respond after the meeting.

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Or feel free to follow up with <u>kheinemeier@frontierenergy.com</u> with a cc to <u>info@title24stakeholders.com</u>



Defrost Control

- Background
- Market Overview
- Technical Considerations

Defrost Efficiency: Background

- Defrost cycles prevent outdoor coils of a heat pump or air conditioner from icing up.
- Defrost modes run the system backwards—on a heat pump, this is essentially air conditioning the space—to warm up the outside coils, then reheat the space by running supplementary heating.
- Many systems use a delay timer to start the defrost cycle and a temperature measurement or timer to end the cycle.



Defrost Efficiency: Background

Defrost cycles increase energy use and contribute to discomfort.

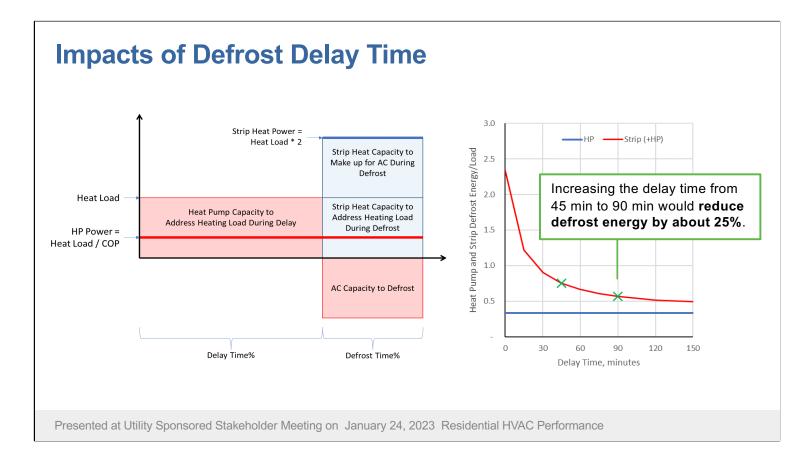
Some controls engage defrost even when it isn't needed.

- Delay timers are typically not set optimally.
- Most systems do not sense when defrost is actually needed.

Defrost modes can create uncomfortable cool drafts if design of the air-distribution system is not optimal (see "Design" measures).

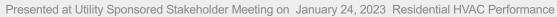
The Proposed Code Changes Would...

- Require setting delay timers optimally.
- Give credit for systems that provide advanced control.



Defrost Efficiency: Current Code Requirements

- Current code does not address how or when Defrost is done.
- It explicitly allows supplementary heating when in Defrost mode.





Defrost Efficiency: Proposed Requirements

Mandatory: Proposed requirement that if it has a defrost delay timer, it must be set and verified to be ≥ 90 minutes

Compliance Option: Proposed to be eligible for Defrost Smart Control Compliance Credit, [TBD] for:

- Embedded controls:
 - Demand Control Defrost
 - Detection of excessive differential air pressure across coils
 - Measurement of coil temperature
- Thermostat-based controls:
 - Turn blower motor off

For this credit, would require that options be configured properly and possibly HERS-verified.



Defrost Efficiency: Market Overview and Analysis



Current Market

- Most products have a delay timer that can be set at ≥90 minutes " (jumper or dip switch).
- Some products have advanced controls to sense when defrost is needed.



Market Trends

• Advanced controls are typically available in only the highest end systems.



Market Barriers

• This is seldom a feature that is advertised or considered a differentiator. Code requirements would overcome this barrier.

Defrost Efficiency: Technical Considerations

Technical Considerations

• Setting delay timer properly is a simple task.

Technical Barriers and Potential Solutions

• Training might be required to convince contractors to use optimal configuration.





Crankcase Heating

- Background
- Market Overview
- Technical Considerations

Crankcase Heating: Background

- Crankcase heating (CCH) keeps the compressor of a heat pump or air conditioner warmer than the outdoor coils and casing. This prevents the migration of liquid refrigerant into the compressor, which could cause severe damage.
- CCH only needs to run when the compressor is off.
- A variety of superior technologies exist, including compressors that do not require CCH, and controls that operate CCH only as needed.

Crankcase Heating: Background

- Field monitoring studies have found that CCH can consume surprising amounts of energy, particularly in low load buildings or other applications where the compressor is off frequently.
- Poorly controlled crankcase heating is particularly a problem in Air Conditioners, where the CCH can run all winter long.

The Proposed Code Changes would...

- Avoid CCH that unnecessarily run when the compressor is ON.
- Encourage CCH that only run when temperatures are low.
- Reward systems that do not require CCH.

Field Research

- For one monitored project, CCH in apartments consumed 900-2300 kWh/year, or almost half of the total annual HVAC load.1
- CCH in each apartment at a complex in California was a fixed load of about 100 watts, consuming about 900 kWh/year or half of the average systems' energy use.2
- A research house in central California found CCH was roughly half the total energy for the system's cooling energy use.³

1. "Heat Pump Controls: Decarbonizing Buildings While Avoiding Electric Resistance Heating and Higher Net Peak Demand," ACEEE Summer Study 2022, McHugh, German, Dryden, Larson, Feng, Bade, and Alatorre, August 2022.

"Getting to All-Electric Multifamily ZNE Construction. Draft Final Project Report." EPC-15-097. Dryden, Pfotenhauer, Stone, Armstrong et al. March 2021.
 PGE Central Valley Research Homes, Variable Capacity Heat Pumps, Evaluation of Ducted and Ductless Configurations 2016-2017. Wilcox, Conant, and Chitwood. 2018

Crankcase Heating: Current Code Requirements

DOE regulates OFF mode power*, including CCH, for residential air conditioners and heat pumps.

 The DOE standard is Pw,off ≤ 30W for air conditioners and ≤ 33W for heat pumps, as determined by the AHRI 210/240 test method and calculations.

DOE does not regulate the ON mode power of CCH



There are no current Title 24 requirements, although CCH is included in energy calculations.

*Code of Federal Regulation 10 CFR §430.32(c).

Crankcase Heating: Proposed Requirements

Mandatory: Propose to disallow, for heat pumps or air conditioners, CCH that runs continuously, even when the compressor is ON.

• Installer would be required to provide manufacturer certification that CCH does not run when the compressor is ON, or that there is no CCH.

Prescriptive: In addition, one of these options would be required:

- 1. Install [TBD] additional energy savings measure, saving approximately 200 kWh/yr.
- 2. Provide manufacturer certification of CCH performance:
 - "P2" measurement from AHRI 210/240 testing, which would be required to be less than [TBD]
 - Type of control, which would be required to include either:
 - Thermostatic Control (off above [TBD] degrees), or
 - Positive Temperature Coefficient Control (wattage varies with temperature).
- 3. Provide manufacturer certification that the equipment does not have CCH.

Crankcase Heating: Market Overview and Analysis

Current Market

- HVAC OEMs provide little or no information on CCH wattage and controls in the published performance data and manuals
- Of the 32 different unit models (over 11 different manufacturers), 16 included CCH as a standard factory installed component. That equates to 50% of the units surveyed.
- Almost all manufacturers stated the recommendation and/or need for CCH if the heat pump is to operate in low ambient conditions, in "extreme cold operation" in northern parts of the US and Canada, in Climatic Zones 1,2, and 3 (includes most of California), in ambient conditions < 55 deg F.
- CCH Power: of the models of resistance heaters reviewed, the total power input ranged from 70 W 150 W.

Source: "UPDATE #2: Residential Heat Pump Crankcase Heater, Product Review." Red Car Analytics Memorandum. Stober and Bulger. 2022

Crankcase Heating: Market Overview and Analysis



Market Trends

• There are no known factors driving market change. There is almost no visibility to market actors.



Market Barriers

- In most cases the P_{w,off} value listed with DOE is equal to the DOE maximum allowed value. OEMs are only required to certify that they meet the DOE standard, not publish measured power or other detailed information.
- Provide a pathway for OEMs to voluntarily report more detailed information for use in the compliance calculations. The information reported could be aligned with the DOE P_{w,off} test method to facilitate OEM participation

Source: "UPDATE #2: Residential Heat Pump Crankcase Heater, Product Review." Red Car Analytics Memorandum. Stober and Bulger. 2022

Crankcase Heating: Technical Considerations

Technical Considerations

- OEMs would voluntarily provide applicable test measurements
- The reported values would be input into CBECC-Res
- Compliance calculations would use these inputs instead of default assumptions

Technical Barriers and Potential Solutions

• No technical barriers. The main barrier would be a market barrier: Would OEMs provide the information?

Discussion: Defrost and Crankcase Heating

- What do we have wrong?
- What do we have right?
- How could we improve this?
- Do you have information or data that would help us?

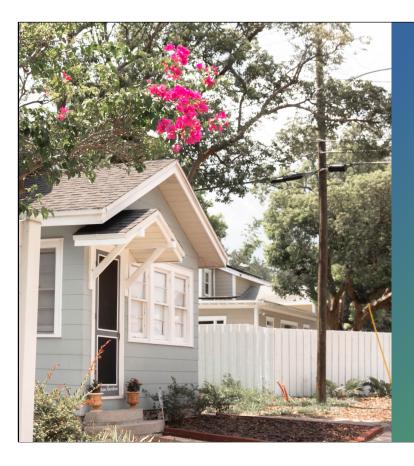
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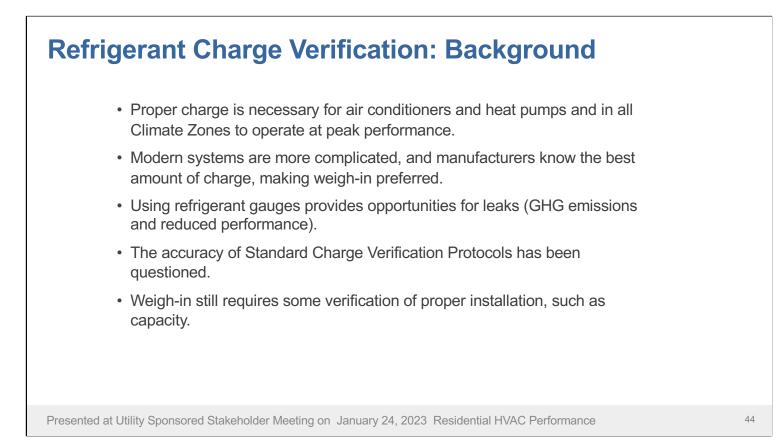
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15 Minute Break



Refrigerant Charge Verification

- Background
- Market Overview
- Technical Considerations

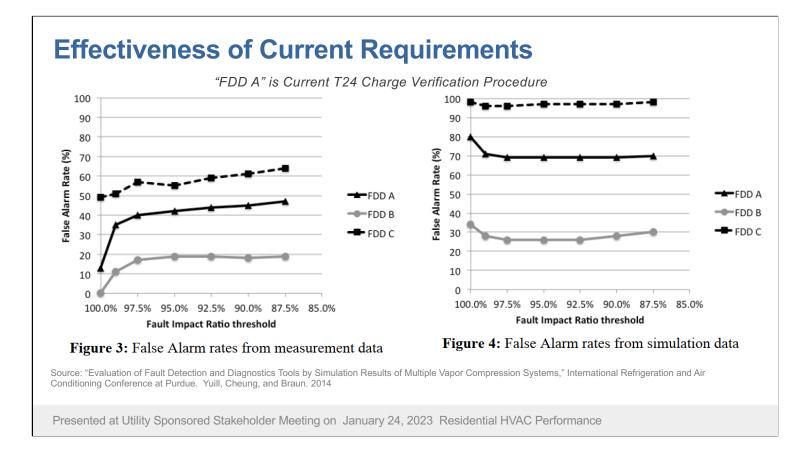


Refrigerant Charge Verification: Background

- Verification of weigh-in of manufacturer recommended amounts of refrigerant can be done less expensively than Standard Charge Verification.
- New systems and variable-capacity systems are more complex, and manufacturer weigh-in recommendations should be relied upon.
- Less expensive remote verification is warranted, with simple weigh-in methods and new documentation technologies.

The Proposed Code Changes would...

- Shift focus from charge testing (subcooling and superheat) to verified weigh-in and supplementary performance tests (capacity).
- Provide an option for HERS Raters to verify weigh-in REMOTELY, with electronic documentation and remote HERS validation.



Refrigerant Charge Verification: Current Requirements



- Refrigerant charge must be verified for air conditioners and heat pumps in CZs 2 and 8-15.
- Standard Charge Verification Procedures:
 - Fixed Metering Device: Superheat
 - Variable Metering Device: Subcooling
- Weigh-in Observation
- Winter Installation: Weigh-in, condenser outlet air restrictor, or return visit
- Efficiency is derated by 10% without verification, 4% with verification

Refrigerant Charge Verification: Proposed Requirements

Mandatory: In all Climate Zones where verification is found to be cost effective, heat pumps and air conditioners would be **required to have refrigerant charge verified**.

Mandatory: When charge verification is required, there would be three options available:

- 1. Current Standard Charge Verification Procedure
 - Including winter setup and tentative approval with return visit.
 - Only allowed for Single Speed systems, or when following manufacturer recommendations.
- 2. Weigh-In Charging Procedure, with ONSITE Verification
 - Current Weigh-In procedure, including <u>ONSITE</u> HERS observation.
 Exception: Pre-charged systems with line length less than [TBD].
 - Capacity test, including <u>ONSITE</u> HERS verification.

- 3. Weigh-In Charging Procedure, with REMOTE Verification
 - Current Weigh-In procedure, including <u>REMOTE</u> HERS observation.
 Exception: Pre-charged systems with line length less than [TBD].
 - Capacity test, including <u>REMOTE</u> HERS verification.

Sampling allowed only for Standard Charge Verification and Capacity Tests for ONSITE Weigh-In.

Refrigerant Charge Verification: Market Overview and Analysis



Current Market

- · All manufacturers provide required weight of refrigerant
- Past refrigerant charge programs focused on testing with gauges, which is less accurate and prone to refrigerant releases, and not suitable for variable capacity systems.



Market Trends

• Anecdotal evidence suggests verification is not always of high quality.



Market Barriers

• The cost for HERS verification may be a big contributor to noncompliance rates, so reducing the cost may improve compliance rates.

Refrigerant Charge Verification: Technical Considerations

Technical Considerations

- Researchers have suggested that current methods may have a 50% chance of misreporting appropriateness of charge.
- Modern systems are more complicated, and manufacturers know the best amount of charge, making weigh-in preferred.
- Still important to verify that contractors are using due diligence.

Technical Barriers and Potential Solutions

- HERS capability to receive electronic documentation and verify that proper adjustments were made must be developed, and both HERS Raters and contractors would need to be trained on how to utilize it.
- Capacity test procedures would need to be developed and training provided.
- Other solutions such as FDD can also be considered.



Variable Capacity / Zoned Systems

- Background
- Market Overview
- Technical Considerations

Variable Capacity / Zoned Systems: Background

Variable Capacity and Multi Speed (VCMS) systems can provide much improved system efficiency, accounted for in high SEER ratings.

However, when the airflow rate is reduced, the distribution efficiency is reduced, and attic duct losses climb. This is not reflected in standard modeling of VCMS systems.

- Compliance software currently provides a VCHP-Detailed system type, which:
 - · Calculates energy savings from low-speed performance
 - Calculates the penalty of reduced distribution efficiency at reduced airflow rates
 - · Is limited to use with NEEP-listed cold climate heat pumps only.

This system type is voluntary, so the energy penalty is not required to be modeled.

- Currently, airflow and fan efficacy (W/cfm) testing of zonally controlled VCMS systems can be done at maximum speed with all dampers open—this overlooks the efficacy penalty if a zone is calling for high speed fan and not all dampers are open.
- All zoned systems are currently required to deliver 350 cfm per ton of nominal cooling capacity, neglecting systems—such as multi-splits that zone using multiple air handlers instead of dampers.

Variable Capacity / Zoned Systems: Proposed Requirements

Mandatory for all Variable Capacity/Zoned Systems:

 VCMS/Zoned systems must do airflow and efficacy testing in every zonal control mode.

Exception: Systems with integrated compressor/fan speed and zone controls may be tested with all zones calling.

 For systems with multiple air handlers, the sum of airflows measured at all air handlers must be at least 350 cfm per ton of <u>compressor</u> capacity, not per ton of each <u>air handler</u> capacity.

Proposed CBECC-Res Modeling of Variable Capacity Systems:

- For non-zonally controlled VCMS systems with attic ducts, performance (airflow, distribution efficiency, and duct loss) will be calculated as a function of instantaneous load.
- The VCHP-Detailed option will be retained.

Variable Capacity / Zoned Systems: Market Overview & Analysis



Current Market and Market Trends

- Compliance challenges and incentive programs are increasing the adoption of VCMS
- Zonal control appears to be a more popular means of providing uniform temperatures than multiple systems
- Of the cold climate heat pumps in the NEEP database, 25,584 out of 38,641 units are variable capacity



Market Barriers

- The primary market barrier to improving airflow and efficacy of zonally controlled systems is the higher cost of systems that integrate zonal control and compressor/fan speed
- Building departments may not be enforcing efficacy testing, particularly measurement of fan watts

Variable Capacity / Zoned Systems: Technical Considerations

Technical Considerations

- Would represent only a minor modification to the way that airflow and efficacy tests are done for these systems
- CBECC-Res contains and applies algorithms that calculate duct loss as a function of airflow rate; VCMS systems can be identified using the existing Multi-speed Compressor check box

Technical Barriers and Potential Solutions

- To implement CBECC-Res modifications, a relationship between load, capacity, and airflow must be established that is representative of commonly used HVAC systems
- Data from available expanded performance tables is being reviewed for this purpose; additional data would improve accuracy

Discussion: Charge Verification and VC/Zoning

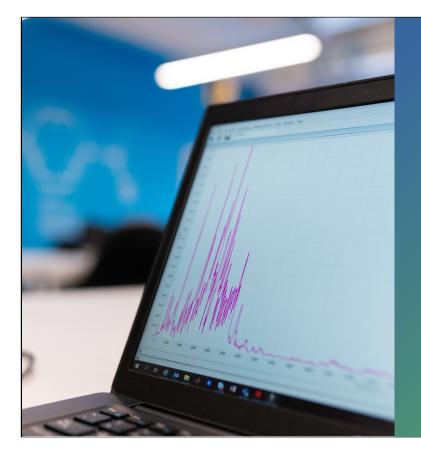
- What do we have wrong?
- What do we have right?
- How could we improve this?
- Do you have information or data that would help us?

Submit questions and comments using the Menti link. We will attempt to discuss these today. If we don't get to your question, we will respond after the meeting.

Raise your hand to ask a question.

We will call on you and invite you to unmute yourself. If we don't get to your question, please submit it using the link, and we will attempt to respond after the meeting.

Or feel free to follow up with <u>kheinemeier@frontierenergy.com</u> with a cc to <u>info@title24stakeholders.com</u>



Energy and Cost Impacts Per Home/Dwelling Unit

- Energy Savings Methodology
- Cost Impacts Methodology and Results
 - Incremental costs
 - Energy cost savings

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Methodology for Energy Impacts Analysis

Overall methodology for per-home energy and demand impacts:

- Model prototypes [Single-Family (2100 sqft, 2700 sqft, 500 sqft) and Multi-Family (Low-rise Garden, Loaded Corridor, Mid-rise, High-rise Mixed Use, and High-rise Apartment)] in all CZ
- For each measure, standard design is a Single Speed Heat Pump.
- For each measure, the proposed design is improved per the measure description.
- Will report first-year energy savings (kWh, therms, kW, source energy) and life-cycle cost-benefit and annual statewide savings



| Μ | easure | Standard Assumptions | Baseline Assumptions | | |
|--------------------|------------------|--|---|--|--|
| Sizing | | Use Man S sizing rules | Use T24 rules | | |
| Supplementary Heat | | CBECC-RES strip heating assumptions | Strip heating does not run at OA > 35°F, except during defrost | | |
| Defrost | Set Time Delay | CBECC-RES | Standard with defrost energy reduced by 25% | | |
| Denost | Smart Control | defrost assumptions | [<mark>TBD</mark>] | | |
| Crankcase | OFF when comp ON | 33W or 11W/ton | 33W or 11W/ton OFF when compressor ON | | |
| Heating | OFF above OAT | 8760 hours of operation | 33W or 11W/ton OFF above [<mark>TBD</mark>] OAT | | |
| Charge | Heat Pumps | CEM = 0.90 in CZ 1,3-7,16 | CEM = 0.96 in all CZs | | |
| Verification | Air Conditioners | CEM = 0.96 in CZ 2,8-15 | CEM = 0.96 in all CZs | | |

commissions for Standard and Dranasad Designs A

| | | Annual Electricity Savings (kWh/yr) | Annual Natural Gas Savings (Therms/yr) | Peak Demand Reduction (W) | Annual Life Cycle Energy Cost Savings (kBTU/yr) | Annual Source Energy Saving (kBTU/yr) |
|------------------------|------------------------|---|--|------------------------------|--|---|
| Sizing | By Prototype and CZ | | | | | |
| Supplementary Heat | By Prototype and CZ | | | ongoi | ng | |
| Defrost | By Prototype and CZ | | 1,15 | Onge | | |
| Crankcase Heating | By Prototype and CZ | V | Jork 15 | | | |
| Charge Verification | By Prototype and CZ | | | | | |

Preliminary Energy Savings Estimates: Refrigerant Charge Verification for Heat Pumps

| | | 2,100 sq. | ft. | 2,700 sq. ft. | | | |
|-----------------|--|-----------------|---|--|-----------------|---|--|
| Climate Zone | Annual Electricity Savings (kWh) | SLCC Savings | Annual Source Energy Savings (kBtu) | Annual Electricity Savings (kWh) | SLCC Savings | Annual Source Energy Savings (kBtu) | |
| 1 | 205 | \$1,533 | 546 | 197 | \$1,485 | 540 | |
| 3 | 74 | \$651 | 252 | 75 | \$675 | 270 | |
| 4 | 110 | \$861 | 315 | 142 | \$1,080 | 432 | |
| 5 | 67 | \$546 | 231 | 61 | \$513 | 216 | |
| 6 | 23 | \$189 | 84 | 31 | \$270 | 81 | |
| 7 | 23 | \$168 | 63 | 33 | \$216 | 54 | |
| 16 | 205 | \$1,596 | 546 | 238 | \$1,809 | 648 | |

• Verifying charge for HPs in CZs 2, 8-15 will have the same costs and higher savings than for AC, and the cost effectiveness for AC in those CZs has already been established, so no analysis will be done.

• There will be a separate analysis for verifying charge for AC in these CZs.

Preliminary Energy Savings Estimates: Crankcase Heating

| | | 2,100 sq | . ft. | 2,700 sq. ft. | | | | |
|-----------------|-------------------------------------|-----------------|--|-------------------------------------|-----------------|--|--|--|
| Climate Zone | Annual Electricity Savings (kWh) | SLCC Savings | Annual Source Energy Savings (kBtu) | Annual Electricity Savings (kWh) | SLCC Savings | Annual Source Energy Savings (kBtu) | | |
| 1 | 171 | \$3,927 | 357 | 174 | \$3,996 | 351 | | |
| 2 | 207 | \$5,040 | 441 | 208 | \$4,887 | 459 | | |
| 3 | 244 | \$6,216 | 546 | 245 | \$6,210 | 540 | | |
| 4 | 240 | \$5,523 | 546 | 239 | \$5,454 | 540 | | |
| 5 | 237 | \$5,985 | 525 | 238 | \$5,994 | 513 | | |
| 6 | 271 | \$6,762 | 672 | 270 | \$6,723 | 648 | | |
| 7 | 279 | \$7,119 | 693 | 278 | \$7,101 | 675 | | |
| 8 | 262 | \$6,195 | 630 | 261 | \$6,129 | 621 | | |
| 9 | 256 | \$5,985 | 609 | 255 | \$5,886 | 594 | | |
| 10 | 238 | \$5,544 | 546 | 237 | \$5,481 | 540 | | |
| 11 | 201 | \$4,557 | 420 | 202 | \$4,563 | 405 | | |
| 12 | 219 | \$5,061 | 483 | 218 | \$4,968 | 459 | | |
| 13 | 204 | \$4,536 | 441 | 204 | \$4,536 | 432 | | |
| 14 | 198 | \$4,410 | 420 | 197 | \$4,401 | 432 | | |
| 15 | 248 | \$5,838 | 630 | 334 | \$7,884 | 837 | | |
| 16 | 155 | \$3,591 | 336 | 170 | \$3,915 | 351 | | |

Incremental Per Home / Dwelling Unit Cost

| Incremental First Cost | | Incremental Maintenance C | ost |
|------------------------|--------------------------|---------------------------|--------------|
| Equipment | \$x,xxx.xx | Equipment Replacement | \$x,xxx.xx |
| Installation | \$x,xxx.xx | Annual Maintenance | (\$x,xxx.xx) |
| Design / Permitting | \$x,xxx.xx | Other? | \$x,xxx.xx |
| HERS Verification | \$x,xxx.xx | Other? Total | \$x,xxx.xx |
| Other? | \$x,xxx.xx | , One | |
| Total | \$x,xxx.xx \$x,xxx.xx | (12) | |
| | No., | - | |
| | ν. | | |
| | | | |
| | | | |

Incremental Cost Information

How we are collecting costs of base case technology and proposed technology:

- Base case is Single Speed Heat Pump with electric strip heating, with crankcase heating, no extra controls, charge verification per 2022, a range of sizes.
- Interviews and surveys with manufacturers of ongoing
 Mork is

M=materials, L=design/installation labor, H=HERS labor

| 1a | inual J Load Calc: |
|-----|---|
| | Full cost avoided by not doing Man J Calc (L) |
| | Incremental cost avoided by using simplifications in Man J Calc (L) |
| Blo | ower Door Test: |
| | Full cost of contractor doing Blower Door test (L) |
| | Full cost of HERS Rater doing Blower Door test (L) |
| Sys | stem Selection: |
| | Incremental cost per ton avoided by avoiding oversized system (M) |
| Du | ct/Diffuser Design: |
| • | Full cost to document duct/diffuser design (L) |
| • | Full cost for designer to self-certify (L) |
| SU | IPPLEMENTARY HEATING |
| Str | ip Heating Efficiency: |
| • | Incremental cost for controls for recovery lockout and OAT lockout (M,L) |
| • | Incremental cost for HERS Verification of controls (H) |
| Du | al Fuel Efficiency: |
| • | Incremental cost for controls for OAT lockout (M,L) |
| • | Incremental cost for HERS Verification of controls (H) |
| DE | FROST EFFICIENCY |
| • | Incremental cost to set delay timer (L) |
| • | Incremental cost for Smart Defrost Control (M,L) |
| • | Incremental cost for HERS Verification of controls (H) |
| CR | ANKCASE HEATING EFFICIENCY |
| • | Incremental cost avoided by avoiding CCH (HP) (M) |
| • | Incremental cost avoided by avoiding CCH (AC) (M) |
| RE | FRIGERANT CHARGE VERIFICATION |
| • | Full cost for weigh-in with onsite HERS Verification (L,H) |
| • | Incremental cost for SC/SH testing (vs. weigh-in) (L,H) |
| • | Full cost for Capacity Tests (L,H) |
| • | Incremental cost avoided by using remote verification (vs. onsite) (L,H) |
| VA | RIABLE CAPACITY / ZONED SYSTEMS |
| • | Incremental cost for fan efficacy test with only smallest zone calling (L,H |
| | Full cost for SP test (L.H) |

Incremental Cost Poll Coming Up...

In a minute, we'll open up polls to help us gauge the costs of some of the options.

Please provide a quick ballpark estimate of the *incremental* cost for the items to the right, including labor, materials, design, installation, permitting...

Or feel free to follow up with <u>kheinemeier@frontierenergy.com</u>

cc. <u>info@title24stakeholders.com</u> to share information confidentially.

Approximately what would be the typical <u>added</u> <u>cost</u> for the following upgrades to a <u>central</u> <u>ducted furnace and air conditioner</u> system?

Assuming new construction, production builder, 3ton, single-speed, no strip heat, and code minimum efficiency.

From that central furnace/AC to a heat pump

- a. From the <u>central furnace/AC</u> to a <u>DUAL FUEL</u> <u>heat pump</u>
- b. From the <u>3-ton standard heat pump</u> to a <u>4-ton</u> heat pump
- c. From that <u>single-speed</u> heat pump to a <u>variable</u> <u>capacity</u> heat pump
- d. Adding strip heating to that heat pump
- e. Adding a <u>thermostat with an OAT sensor</u> to that heat pump

Poll Request (Incremental Costs: HP Upgrade)

- Measure Name: Incremental Costs: HP Upgrade
- Type of Poll: Word Cloud
- **Question:** Approximately what would be the typical added cost to upgrade from a <u>central</u> <u>furnace/AC</u> to a <u>heat pump</u>?
- Placement: After poll on "Incremental Cost Poll Coming Up..." (slide 62?)
- Broadcast results to attendees as they respond: (Y)
- Make poll public during presentation: (Y)

Poll Request (Incremental Costs: Dual Fuel HP)

- Measure Name: Incremental Costs: Dual Fuel Upgrade
- Type of Poll: Word Cloud
- **Question:** Approximately what would be the typical added cost to upgrade from a <u>central</u> <u>furnace/AC</u> to a <u>Dual Fuel heat pump</u>?
- **Placement:** After poll on "Est Costs Baseline" (slide 63?)
- Broadcast results to attendees as they respond: (Y)
- Make poll public during presentation: (Y)

Poll Request (Incremental Costs: Increase by 1 Ton)

- Measure Name: Estimated costs: Increase by 1 Ton
- Type of Poll: Word Cloud
- **Question:** Approximately what would be the typical added cost to upgrade from the <u>3-ton</u> standard heat pump to a <u>4-ton</u> heat pump?
- **Placement:** After poll on "Inc. Costs: Dual Fuel Upgrade" (slide 64?)
- Broadcast results to attendees as they respond: (Y)
- Make poll public during presentation: (Y)

Poll Request (Incremental Costs: Single to Variable)

- Measure Name: Incremental Costs: Single to Variable
- Type of Poll: Word Cloud
- **Question:** Approximately what would be the typical added cost to upgrade from that <u>single-speed</u> heat pump to a <u>variable capacity</u> heat pump?
- Placement: After poll on "Inc Costs Increase by 1 Ton" (slide 65?)
- Broadcast results to attendees as they respond: (Y)
- Make poll public during presentation: (Y)

Poll Request (Incremental Costs: Strip Heating)

- Measure Name: Incremental Costs: Strip Heating
- Type of Poll: Word Cloud
- **Question:** Approximately what would be the typical added cost to add <u>strip heating</u> to that heat pump?
- **Placement:** After poll on "Inc Costs Single to Variable" (slide 66?)
- Broadcast results to attendees as they respond: (Y)
- Make poll public during presentation: (Y)

Poll Request (Incremental Costs: Tstat with OAT Sensor

- Measure Name: Incremental Costs: Tstat with OAT Sensor
- Type of Poll: Word Cloud
- **Question:** Approximately what would be the typical added cost to add a <u>thermostat with an</u> <u>OAT sensor</u> to that heat pump?
- **Placement:** After poll on "Inc Costs Strip Heating" (slide 67?)
- Broadcast results to attendees as they respond: (Y)
- Make poll public during presentation: (Y)

| | Design | Supp Heating | Defrost | ССН | Charge Verif | VC / Zoned |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Metric: | By Prototype By CZ |
| Benefits: Life Cycle Energy Cost Savings + Other PV Savings (2026 PV\$) | | | | poing | | |
| Costs: Total Incremental PV Costs (2026 PV\$) | | Nork | is Ori | 9 | | |
| Benefit-to-Cost Ratio | | N * | | | | |
| Presented at Utility Sponsored Sta | keholder Meeting | on January 24, | 2023 Residentia | I HVAC Performa | ance | |

Statewide Energy Impacts Methodology

The Statewide CASE Team estimates annual statewide impacts by multiplying **A x B x C**:

- A. per-home/dwelling unit energy impacts (discussed in previous section)
- B. number of homes/dwelling units of new construction/additions/alterations of each applicable building type
- C. portion of affected homes/dwelling units in each climate zone

| Per Unit Impact Savings type Savin per so | | Affected | New Cons | A | | | | | |
|---|-----------------------|-----------------|------------------------|------------|-------------|-----------------|------------------------------|-------|---------------------------------------|
| | | | | struction | ~dC | St | atewide Energ | gy In | npacts |
| | • | Climate Zone | SF2100 sq ft | SF2 00 | (19 | Climate Zone | Elec Savings (GWh) | | GHG savings (MT CO ₂ e) |
| Electricity [X] kW | Wh | 1 | 50,000 | 70,000 | | 1 | 20 | | 1,500 |
| Peak demand [X] W | Vatts | 2 | 75,000 | 90,000 | | 2 | 50 | | 3,000 |
| Natural gas [X] Th | herms | | | | | | | | |
| GHG emissions [X] To | ons CO ₂ e | 16 | 8,000 | 15,000 | | 16 | 100 | | 2,000 |
| | | | | | | | | | |
| Presented at Utility Spon | nsored Stakeholder N | leeting on | January 24, | 2023 Resid | dential HVA | C Perform | ance | | 73 |



Compliance and Enforcement

- Design
- Permit Application
- Construction
- Inspection
- Revisions to Compliance Software

Proposed Compliance and Verification Process

1. Design Phase

- · Specify a system that meets mandatory and selected prescriptive requirements.
- Carry out sizing calculations per requirements, prepare a duct layout or room-by-room list air distribution system meeting the requirements of the local jurisdiction, and self-certification that air distribution design meets best practices.

2. Permit Application Phase

• Submit permit application package with CF1R including worksheet with ACCA Manual J, S and D calculations and air distribution layout or list, and self-certification of design.

3. Construction Phase

- Install the correct equipment according to manufacturer's instruction (including Refrigerant Charge weigh-in target).
- · Acquire necessary manufacturer certifications on Crankcase Heating.
- Conduct testing (infiltration, refrigerant charge, efficacy for variable capacity/zoned system).
- Prepare CF2Rs, including results of testing.
- Submit electronic documentation of testing for remote HERS verification or obtain onsite verification; receive CF3Rs.

4. Inspection Phase

- · Building inspector may verify correct equipment installed.
- Building inspector verifies that all required CF3Rs are completed.

Presented at Utility Sponsored Stakeholder Meeting on January 24, 2023 Residential HVAC Performance

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Compliance and Verification

Many measures are interactive and will require more attention to design, and design information on CF1R.

- HERS Verifications:
 - Blower Door tests in some circumstances, in existing buildings.
 - Strip heating and Dual Fuel lockout controls.
 - Defrost delay timer setting and advanced controls configuration.
 - Refrigerant Charge Verification in more systems, with modified methods (remote methods added).
- Proposed modifications to HERS process:
 - Define bundles of verifications rather than individual verifications: individual measures may not trigger a verification, but when verification is done, it should include a full set of measures.
 - Process to be developed by HERS Providers to carry out remote verification after documentation submitted electronically.
- More emphasis on disclosures and self-certifications
- After adoption, EnergyCodeAce will be a resource to assist in compliance and verification.

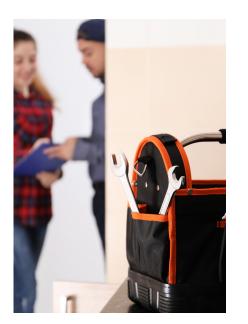
Market Actors

Market actors involved in implementing these measures include: HVAC Designer, HVAC Installer, Builder, HERS Rater, HERS Provider, Code Official/Plans Checker, Original Equipment Manufacturer, Homeowner.

CASE report will include a discussion of:

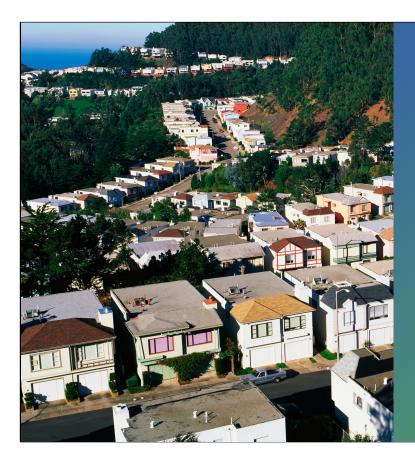
- · Related tasks in the current compliance process
- How the proposed CASE measure will impact current processes or workflow
- How the proposed code change would impact compliance and enforcement
- Opportunities to minimize negative impacts of requirements while
 maximizing positive impacts

We are in the process of surveying and interviewing stakeholders (except homeowners).





| Draft Code Change Language | |
|---|----|
| Draft code language available for review in the handouts and downloadable. | |
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| | |



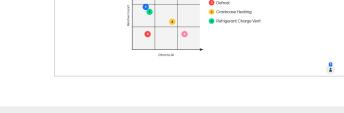
General Discussion and Next Steps

Poll Request (How would you describe proposals?)

- Measure Name: How Would You Describe these Proposals?
- Type of Poll: Word Cloud
- Question: What one or two words would you use to describe these proposals?
- **Placement:** After "General Discussion and Next Steps" slide (Slide 78?)
- Broadcast results to attendees as they respond: (Y)
- Make poll public during presentation: (Y)

Poll Request (Rate Measures by Effort and Impact)

- Measure Name: Rate Measures by Effort and Impact
- Type of Poll: 2x2 Grid
- **Question:** Please rate each of the proposed measures according to how much effort it will take by all parties, and by relative energy impact.
- Answers: Load Calcs / Sizing; Supp Heating; Defrost; Crankcase Heating; Refrigerant Charge Verification
- **Placement:** After poll on "How would you describe Proposals?" slide (Slide 79?)
- Broadcast results to attendees as they respond: (Y)
- Make poll public during presentation: (Y)



2 Supp Heating Cont

Rate the Effort and Impacts of these

Measures

Next Steps: We want to hear from you!Provide any last comments or feedback on this presentation now verbally or using the Menti link More information on pre-rulemaking for the 2025 Energy Code at <a href="https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-building-energy-efficiency-standards/2025-building-energy-efficiency-standards/2025-building-energy-efficiency-standards/2025-building-energy-efficiency Standards of the second se

Thank You

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