

## Jennifer Elwell

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**From:** Tom Alkire <tom@rep-west.com>  
**Sent:** Thursday, October 21, 2021 1:23 PM  
**To:** Jennifer Elwell  
**Cc:** Tom Alkire  
**Subject:** BAAQMD Regulation 9, Rule 6-301 and 303 - COMMENTS

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Good Morning Jennifer,

While no longer a resident within the BAAQMD, I do consider myself a stakeholder in this matter. My company represents a prominent manufacturer of water heating products that are sold through wholesale distributors to plumbing, heating and mechanical contractors. We serve the new construction and replacement markets for residential and commercial products. Our company and me personally have been very active throughout the Bay Area over the past 24 months educating wholesale distributors, installing contractors and consumers alike about residential Heat Pump Water Heater technology. We support and embrace technology advancements that make products more efficient and safer for the environment. But, in some cases the desire to advance goals before the technology and supporting industry is ready for it, problems and in some cases dangers can result.

My goal in providing the below is to help you create rules that work for the “common” people within the BAAQMD, not just the extreme positions. Decarbonization is expensive and has consequences which not everyone is ready to accept.

### **For Rule 9-6-301**

- **I ask that the BAAQMD does not change the effective date of Jan. 1, 2027. Any movement forward or backwards will have significant impacts on the manufacturing, distribution and installation of these products. .**

The impact that Rule 9-6-303 will have on the commercial replacement market is significant. While the 2031 target date sounds like it's far down the road, in the world of water heating, it's not. There are too many properties that cannot feasibly retrofit their buildings to accept the electrified products in this timeframe because these products are much larger in size. The replacement water heater business represents +/- 75% of annual commercial installations. Many of these complexes, buildings, schools and restaurants have large hot water needs and high stored temperatures to fight against Legionella contamination. You must also consider the large hydronic heating market within the BAAQMD. Hydronic boilers must run at high temperatures to deliver comfort to the occupants. Occupant safety and comfort should be at the forefront of any initiative. Until the industry has had time to create retrofittable products without major remodels to install them, gas products are the only realistic option to safely and effectively deliver the quantity of water needed at the proper temperatures.

### **For Rule 9-6-303**

- I ask that the BAAQMD consider a stepped approach. Consider a 2-3 year period of business as usual, then require high-efficient (90%) gas products leading up to 2031. These products will reduce carbon emissions the day they start service and will continue doing so for years, bringing you closer to the goal with a “manageable” amount of building updates needed by some businesses to accommodate them. You just might find that when combined with the residential requirements the emissions goal could be met without requiring commercial electrification.

Thank You!



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