

Jennifer Elwell

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Sent: Saturday, October 30, 2021 8:25 PM
To: Jennifer Elwell
Subject: Concerns about Regulation 9 Rule 4

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To whom it may concern,

I own a small water heater installation company that specializes in water heaters, tankless water heaters, heat pump water heaters as well as radiant heating.

I am concerned on a few aspects of this.

Ventilation:

The vast majority of water heaters are installed in sealed hallway closets, mud rooms and kitchens throughout San Francisco. We will more than likely need to install or modify doors in order to have enough cross ventilation.

Many apartments do not have enough square footage to operate without duct work going to the outside.

Many closets are 18 inches or less in diameter. This will require new widened doors and light framing.

Noise:

These units are loud. Rheem, State, AO Smith are all very loud. They have an oscillating reverberation from the fan which is hard to isolate since CA code requires these units to be braced.

They also have a low hum which travels, many water heaters are next to furnaces. The humming and reverberations then travel throughout the home. It is not pleasant.

Condensation:

San Francisco code requires the condensation pipes to be ran in pvc to the outside separately from the T&P pipe. In apartments, condos and townhomes this is nearly impossible, or very expensive to do.

Power:

I read how there is optimism for 120V plug in models, but I do not think they realize how slow a 240V heat pump recovers. We can run these units at higher temperatures and use mixing valves, but are adding to the total cost.

Also, on a shared 15 amp circuit is risky for an area that is known for having old and outdated wiring.

Cost:

Water heaters have tripled in price in the last 10 to 15 years. A decent gas fired tank is around 700 dollars, a decent heat pump unit is double that. I have many clients who can barely afford a new budget water heater.

This will be an absolute shock to at least half of my clients.

Tankless water heaters:

-Many new homes, remodeled homes and other Californians went tankless. They do not have the space to go back in with a tank without having to lose precious square footage, losing a closet or worse.

Many units are mounted outside on a tight property line meaning they could not even build an outdoor shed without an entire relocation. This will be an absolute nightmare for them.

Warranties:

Part of my job is to repair and replace defective units. What terminology will be put in place to cover the consumer when their 3 year old gas fired tankless water heater or tank fail?

Will they get a credit of some sort? They will have no choice but to upgrade to in most cases a complete different brand.

Power grid:

A constant upside of gas fired water heaters is that even in blackouts, people typically still have hot water.

By 2027 will our power grid be able to handle the demand of all of these new units going online?

Below I made comments to part of your proposal.

Who stands to benefit most from the implementation of this policy?

-Environment? Lobbyists? Future generations?

Who may be disproportionately burdened by this policy?

-The low and middle class, they can barely afford their rent, mortgages, loans and more. This will only add to their already tight budgets.

Who is missing from this process and how can we ensure their concerns are represented and addressed?

-The people like me who work 6 days a week installing, repairing and advising on what is being talked about now. We do not have the free time or even the notifications that these things are in the pipeline.

What unintended consequences could result from these draft amendments if they were adopted as envisioned/intended? What steps can be taken to mitigate these adverse impacts?

-Easier to obtain grants and rebates. The rebate programs have been abysmal in recent years keeping the people with the tight budgets to continue with gas fired tank water heaters.

What additional barriers might prevent individuals in certain racial/ethnic/socioeconomic groups from benefitting fully from this policy? Are there further ways to maximize equitable outcomes?

-Grants, rebates, zero interest loans. I see 600+ clients a year, the main issue is money.

I have done more heat pump retrofits in the last 2 years than in the last 10 years of my career.

I am surprised that this is going in to force everyone's hand as opposed to just offering incentives to have a more natural shift.

I urge you all to reach out at the tech, installer and service level to understand all of the potential outcomes of what you are putting in place.

Thank you
Anthony