

November 1, 2021

Jennifer Elwell
Bay Area Air Quality Management District (BAAQMD)
375 Beale Street
Suite 600
San Francisco, CA 94105



1820 Tribute Road, Suite A
Sacramento, CA 95815

Re: Regulation 9 Rule 6: Nitrogen Oxides Emissions from Natural Gas-Fired Water Heaters 2021 Amendment

Dear Jennifer:

PHCC of California appreciates the opportunity to comment on the Bay Area Air Quality Management District (BAAQMD) Regulation 9 Rule 6: Nitrogen Oxides Emissions from natural Gas-Fired Water Heaters 2021 Amendment.

PHCC of California is a 501(c) 6 non-profit corporation whose members are C36 and C20 licensed contractors. PHCC of California dedicates its mission to the advancement and education of the plumbing and HVACR industry for society's health, safety, and comfort and the protection of the environment. PHCC was founded in California in 1900 and incorporated in 1938, focused on training, establishing and improving industry best practices and standards, and consumer protection. PHCC of California respects realistic and common-sense governmental regulation and licensing that supports consumer health, safety and access to reliable and affordable plumbing-heating-cooling-refrigeration technology and equipment.

As such, PHCC of California is interested in the following:

Electrical: Conversion from gas water heaters will require electrical panel upgrades in both older residential homes and communities that are more gas or propane-dependent. What has been the C10 contractor engagement to prepare consumers and contractors to understand the options for needed electrical improvements? What have been the discussions around coordination of service notifications, system designs, power service drops and utility retrenching and conduit replacement? Our concern is that C36 and C20 contractors will find themselves in the middle between the consumer who needs replacement or repair of a water heater and are bound by regulations, permitting rules and available equipment options.

Licensing: What have been the considerations around clarifying the C36 licensee's approval to perform the range of work needed to convert gas to electric water heater installations? Has the C36 contractor community been involved in the rule amendment? For example, one of our concerns is the inherent pressure to undersize a HPWH installation to adhere to licensing limitations, minimize costs and fit the current electrical capacity, resulting in unsatisfied consumers and a poor experience with efforts to decarbonize. PHCC of California urges BAAQMD to engage CSLB in this rule amendment process to provide consistency with existing licensing and reduce contractor and consumer confusion.

Utilities: What has been the coordination with the utilities to understand the availability and needed upgrades to provide more power to residences and who is responsible for those costs? What are the utilities' commitments to balancing these upgrade needs with the utilities' own efforts to decarbonize the grid and power sources? Our concern is that a consumer's investment in electrical upgrades becomes moot if the power service to the residence is not sufficient.

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Engineering: What has been the input from the engineering community for design and associated permits? Our concern is how engineering design services will be provided and who will bear the cost (e.g., consumer, contractor, permitting jurisdiction).

Permitting: What have been the discussions with the local jurisdictions to accommodate the needed expertise and volume of required permits for gas to electrical conversions? We are concerned that local jurisdictions are inadequately staffed to evaluate the designs and issue permits promptly.

Consumer: What are the public education efforts towards a consumer that is well informed on the costs, benefits, financing, equipment availability and processes for gas to electrical conversions and installations? We are concerned that this rule amendment forces unreasonable responsibility for implementation and success on the consumer without sufficiently addressing the above elements.

PHCC of California appreciates the opportunity to provide feedback on this proposed rule change. Please let me know if you have any questions or would like to schedule a meeting to discuss further.

Sincerely,

Deborah K. Maus, CAE
Executive Vice President