

Peter Campbell

From: kory indoorweatherhvac.com <kory@indoorweatherhvac.com>
Sent: Friday, October 4, 2024 7:03 PM
To: Peter Campbell
Subject: [EXTERNAL] Comment on Rule 1111 and 1121

My name is Kory Griggs, and I am an HVAC contractor in the San Bernardino mountains.

I want to comment about the proposal the AQMD is working on to amend rule 1111 and 1121.

1. The public is unaware of the amendment's implications on their future budgets and the costs of repairs to their homes. This must be addressed.

- You recognize that as much as 13% of the structures in the SCAQMD district will require a major expense in infrastructure upgrades to install a heat pump
- You recognize that the cost of operation will increase by as much as 38%
- In climate zones that are cooler than the average SoCal locations equipment cost will be greater due to the need for specialized equipment (low ambient equipment).

2. The reliance of rebate programs to offset the cost of upgrades for the building owners of greatest need.

- These programs usually incentivize early adopters, as they are first come, first served. (Folks of less means typically do not replace equipment in advance of its failure.)
- There is no guarantee that the programs will be available from year to year. (Again, biasing people that have the budget to adapt prior to equipment failure.)
- The programs typically exclude lower efficiency equipment in favor of higher efficiency units. (Favoring higher ticket items over budget friendly equipment, ticket items that those of lower means typically do not choose due to lack of funds.)
- There are no known socioeconomic-based programs.
- There are no known programs for residential infrastructure improvements: panel upgrades, electrical home runs, disconnects, etc.

3. Cost of operation.

- In many areas in CA our electricity rates are artificially inflated (due to “over usage” penalties or TIERED rates, the rates vary from climate zone to climate zone with variable different Tier thresholds.)
- The programs offered by the utility providers for all electric homes rarely offset the cost of operation enough to be effective solutions for most users.
- Higher charges for high use times of day ie. 4-9pm

4. Temporary, emergency replacements.

- The current plan is not workable from a cost perspective.
- In actual emergency situations the possible length of approval times may cause a real hazard to persons or property.
- If the distributors are not allowed to sell gas-fired furnaces or water heaters, who will have the temporary equipment available?

Kory Griggs

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