

## Emily Yen

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**From:** Greg Danenhauer <gdanenhauer@parkerboiler.com>  
**Sent:** Monday, October 2, 2023 5:24 PM  
**To:** Emily Yen  
**Subject:** [EXTERNAL]Re: \*PRESENTATION AVAILABLE\* Proposed Amended Rule 1146.2 Working Group #3

Hi Emily:

Hope you and the 1146.2 staff are well. I started this email a few weeks ago and I'm just getting back to it now. I want to make some formal comments on the rule and recent meeting and of course I want to be sure they go on the public record. I'm not sure if I need to write you a letter to achieve this.

In any case here are our comments.

1 We feel the meeting was somewhat side tracked by Harvey and the use of the time for over 100 people was not that great. I think the meeting went 2.5 hours. There was a lot of material for you to get thru and I appreciated Harvey's passion for solar but I think it got a tad overdone. Michael certainly treated him with respect and patience. That is nice but I think in the future it might be beneficial to have somewhat of a time limit or at least comments on the topic. Some Parker Boiler people listening felt this way too.

2 This is something I've mentioned but the continual references to zero emissions technologies is just not factual at this time as the Ca.grid is about 42% powered by gas, oil or coal.

I do understand heat pumps are point of use zero emissions. As an electric car is but this terminology is not accurate.

3. You mentioned that you are studying waste heat type heat pumps. And these type can generate higher temperatures. I supposed these could be used in facilities with large combustion equipment, electric generators perhaps. So the question comes up: can a facility get a permit at this time to install a gas powered engine and or turbine in the SCAQMD? I've heard conflicting data on this and I would like to understand the facts regarding permitting gas engines as this relates to our discussion of solutions.

4 Listening to the scope of the 64 page(or so) powerpoint makes one see that your task is very difficult in terms of applying a technology that 1- does not fit every job, 2 can't realistically be installed in a timely manner in many cases upon a boiler breakdown due to utility and installation complications. 3 Is not available yet or developed. It is our thinking that a differentiation must be made regarding the temperature and or steam pressure required by a facility. At this time as the temperature goes higher there do not seem to be heat pump solutions for these higher temperatures. The exact temperature when a boiler is the most realistic solution is up for discussion I feel.

5 As you somewhat pointed out in your powerpoint somewhat a lot of cities, districts, states are developing their own policies regarding gas hookups and heat pumps. It would be logical at least in California for there to be a "common" law or at least thought and study together regarding the issue. For instance the CEC Title 8 has quite a lot to say regarding heating water and buildings. And the 2022 CEC code is in effect now. Is there a way to work with them to pool the universe of knowledge together so that there could be uniform laws regarding the issue.

Thank you for your consideration:

Greg Danenhauer  
Parker Boiler Co.  
10/2/23