



Via Electronic Mail

September 16, 2025

President Alice Busching Reynolds
Commissioner Matthew Baker
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: A.24-12-009, Support for California Market Transformation Initiatives

Dear President Reynolds and Commissioner Baker:

Central California Asthma Collaborative, Natural Resources Defense Council, Building Decarbonization Coalition, Rising Sun Center for Opportunity, Rewiring America, and Sierra Club urge you to approve the Application of California Market Transformation Administrator ("CalMTA") in A.24-12-009. CalMTA proposed to develop two technologies that are critical missing pieces to equitable and affordable electrification: 1) 24" 120V induction stoves that fit in smaller kitchens; and 2) 120V window heat pumps tailored for California's climate and buildings. Bringing these products to market as proposed in the CalMTA Application will advance both equity and affordability by helping make decarbonization accessible to low-income and renter households and by reducing the need for grid upgrades to enable the high levels of electrification necessary to achieve the state's climate and air quality objectives.

Development of affordable, portable, 120V room heat pumps that fit in typical California windows will provide a significant benefit to low-income households, renters, and mobile home residents. Access to cooling is a serious issue affecting Californians across the state, and especially in the Central Valley where other cooling options subject residents to harmful outdoor air pollution, which is even more severe on hot days. The room heat pumps developed by the

MTI will provide a much needed option for home cooling that can simply be plugged in to a nearby outlet without the need for electric upgrades or remediation costs. These units are more energy efficient than existing window air conditioners or the swamp coolers some homes resort to for cooling. Unlike other cooling units, these heat pumps would filter outdoor air to provide a critical reprieve from the air pollution that impacts many ESJ communities and often intensifies during heat waves.

120V, battery-equipped induction cooktops and ranges will also provide a transformative benefit to ESJ communities. Switching from gas to electric or induction cooking improves air quality and safety in homes. The MTI will develop products in 24-inch widths that are compatible with appliance cutout sizes commonly found in multifamily housing, mobile homes, and older, smaller buildings. Because they are 120V products, the appliances bring the benefits of induction cooking for households where rewiring the kitchen is either structurally or financially inaccessible, enabling more cost-effective fuel substitution for homeowners and for owners of multifamily properties and affordable housing.

The cost to implement the CalMTA Application is money well spent. Getting these technologies to market will substantially reduce the costs of household electrification, allowing equitable building decarbonization programs to go much further with limited funds. In a recent pilot project developing and deploying 120V window heat pumps tailored for New York City's regional building and climate needs, per-dwelling unit costs for electrification retrofits in affordable multifamily housing dropped from \$38,000 per dwelling unit to "roughly 1/3 of that[, or] less."¹ The pilot found that homes with room heat pumps maintained consistent, comfortable temperatures, that the installation of these 120V products in numerous units did not require electrical upsizing at the building level, and 89% of participants were satisfied with their new room heat pumps, with the remaining 11% neutral and 0% dissatisfied.²

These products will enable existing energy efficiency and decarbonization programs to cost-effectively meet the needs of households that cannot access 240V products like central or mini-split heat pumps, or typical induction ranges and cooktops. 120V products also provide important grid benefits by allowing households to decarbonize without needing to upgrade their electrical panels or service capacity, thus reducing strain on the grid from widespread electrification. And they can provide cost-effective whole-building strategies for owners of older multifamily properties looking to upgrade their buildings without incurring excessive wiring and capacity upgrade costs.

We strongly urge the Commission to approve the CalMTA Application so Californians can reap the many benefits of these technologies.

Sincerely,

Sarah Sharpe
Deputy Executive Director
Central California Asthma Collaborative

Ericka Flores
Clean Energy and Equity Advocate
Natural Resources Defense Council

¹ Building Energy Exchange, Clean Heat for All: Introduction and Program Updates, at 6 (Jan. 16, 2025), https://be-exchange.org/wp-content/uploads/2025/01/20250116_CleanHeat_Slides-UPDATED.pdf.

² *Id.* at 9–12, 14.

Yassi Kavezade
Associate Director of Policy and Campaigns
Building Decarbonization Coalition

Sneha Ayyagari
Director of Policy
Rising Sun Center for Opportunity

Rebecca Curry
Sr. Manager, Western Regional Policy
Rewiring America

Dylan Plummer
Building Electrification Campaign Advisor
Sierra Club

cc: Manisha Lakhanpal, Policy Advisor to Commissioner Baker
Justin Galle, Energy Advisor to President Alice Busching Reynolds
Nick Dahlberg, Energy Advisor to President Alice Busching Reynolds
Service List of A.24-12-009