

CARB Banning of Gas Space & Water Heaters

Public Comments

December 11, 2025

Thank you for allowing me to speak and represent myself and other individuals and homeowners during the 12/11/25 CARB Public Workshop. As I shared, I believe the original proposed rule would place extreme financial hardship on many homeowners, but specifically on multi-family condo, townhome, and apartment complex owners. It is encouraging to learn CARB is proposing to amend its original proposed rule and by doing so will provide greater flexibility including an extended timeframe for allowing the replacement of gas space and water heaters. I believe the amended proposed rule will be to the great benefit of California residents.

What is concerning to me is based on my communications starting as far back as 2023 with the general public, homeowners such as myself, and HOA Board members, I've encountered no one who was aware of this proposed rule to ban gas space and water heaters by 2030. My perception that CARB's efforts to educate homeowners and the general public has been insufficient was further reinforced by the lack of participation by individual homeowners during the 12/11/25 workshop. If this lack of homeowner participation, and overwhelming representation from policy, trade, environmental, commercial companies and/or associations, is any indication of the lack of participation state-wide, I'm very concerned California homeowners' voices on this matter are being drowned out.

With respect to the information shared during the workshop relative to the amended rule, I submit the following for your consideration in the finalization of any regulatory rulings as it relates to replacing existing gas space and water heaters and necessary retrofitting.

Throughout the presentation, data addressing the replacement and retrofitting costs, as well as the percentage of units needing to receive moderate or extensive retrofitting of gas space and water heaters were presented as if the impacts could be considered as mutually exclusive events. (See presentation slides 39, 40, 41). I wish to share that with respect to multi-family complexes, the retrofitting and infrastructure costs would most likely need to be completed together. It would not be realistic, nor cost effective, for a multi-family complex to undergo electrical panel, wiring, and conduit replacement/upgrades for water heaters and then at a later date complete similar upgrades to accommodate space heaters. Multi-family unit owners will be forced to incur higher costs than other homeowners, who can spread upgrades over several years.

Consider the typical electrical panel capacity serving 100-150 amps. A 50 gallon capacity electric water heater and an electric space heater for a 1500 sq. ft. living area would

require near double the capacity of the existing panel (30 amp and 80 amp circuit, respectively). Infrastructure upgrades to accommodate this amount of additional electrical capacity would require not only an evaluation of the existing panel, but also conductor gage and conduit size and most likely require upsizing of conductor wires and conduits.

With respect to the information shared during the workshop relative to other areas impacting cost and reliability of electricity, I did not see any data addressing the existing State's electrical grid capacity and how this rule's resulting increased needed will be able to be met in light of: 1) its current age and size; 2) the competing electrical capacity needs from data centers and AI implementation projects; and 3) growing dependence on inter-state electrical providers who use coal or gas powered plants, thus defeating the desired results of this rule.

Two attachments accompany this document. One that provides a record of all of my previous correspondence with CARB on this proposed rule and one that provides supporting information relative to the safety guidelines when determining if replacement of an electrical panel, conductors, and/or conduits is required.

Respectfully,

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