

Two-Way AC

*Single Family, Duplex and
Townhome*

**Background, Policy Description,
Resources, Discussion**

www.bayareareachcodes.org



When **replacing or adding space cooling**, choose one to install:

1. A **heat pump** space conditioner (cooling + heating) and comply with State Code;

OR

2. An **air-conditioner and other energy improvements** that go above State Code.



2025 Energy Code (Part 6) Nonresidential

- Prescriptively requires heat pumps for units up to 65 kBtu/h (5 tons)

2025 CALGreen (Part 11) Tier 1

- Offers AC-to-HP as voluntary model for local adoption
- Energy Commission, utility consultants, and volunteers have coordinated enhancements to the language, and an Energy Code version (Part 6)
- Requires cost-effectiveness determination

Air Quality Regulations

- Bay Area is in “non-attainment” for ozone and particulate matter (PM)
- Gas appliances generate NOx emissions, which create ozone and PM2.5
- Beginning in 2029 furnace sales will be restricted by California Air Resources Board and the Bay Area Air District

Why Heat Pumps?

- Heat pumps result in major greenhouse gas emission reductions
- Two to four times more efficient than gas furnaces
- Powered by electricity, which in California, is mostly from renewable energy sources
- Can be both an air conditioner and a space heater
- No on-site combustion of gas
- No risk of carbon monoxide poisoning



[Analyze building stock data to estimate]:

- # of existing nonresidential buildings
- # with central air conditioning and gas heating

[Analyze mechanical permit data to estimate]:

- # of annual permits for air conditioner installations or replacements
- % of projects affected annually by proposed requirements



Policy Requirements



When does the Reach Code Apply?



If replacing a furnace
only



Reach code does not
apply

State Code

If adding new or replacement space cooling

Path A

Path B



Install air conditioner

Option 1

Option 2

Option 3

No
ducting

Reusing
ducting

Installing
new
ducting

Follow
State Code
Minimum

Install **4**
additional
efficiency
measures

Install **3**
additional
efficiency
measures

State Code

Reach requirement



Install a heat
pump

No additional
requirements

State Code

If the project reuses existing ducts:

1. Higher fan efficacy (0.45 W/cfm)
2. Refrigerant charge verification
3. R-49 attic insulation
4. Air sealing at the ceiling plane

If the project includes new ducts:

1. Higher fan efficacy (0.35 W/cfm)
2. Refrigerant charge verification
3. R-8 duct insulation



Image: Duct insulation installation

Exceptions allow for the following



Lower efficiency levels

- Existing levels of ceiling insulation
- Small attics



Avoiding hazardous conditions

- Asbestos disturbances
- Atmospherically vented combustion appliances



Avoiding large electrical upgrades

- Knob and tube wiring disturbances
- Electrical service upgrades



Avoiding high costs

- Where the heating load is 12 kBtu/h greater than the cooling load

Policy Impacts



Heat Pump Costs



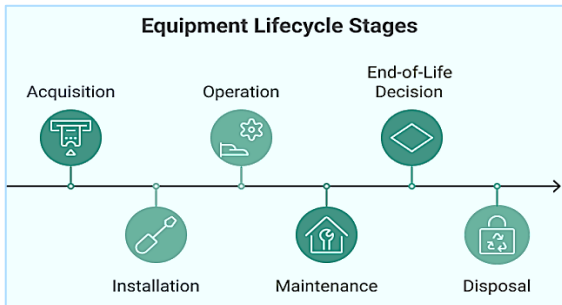
Up-Front Costs

- Heat pumps can cost \$1,000 - \$3,000 more than air conditioner units. Rebates often cover the gap.



Bill Savings

- Heat pumps save residents \$200-\$400 per year in bill costs compared to air conditioners.



Lifecycle Costs

- Heat pumps can both heat and cool a home, so only one piece of equipment needs to be maintained instead of two.

Sources: [Single Family Air Conditioner Replacements Cost-effectiveness Report, Climate Zone 3 & 4](#) & [Bill Impacts of Home Electrification Across the Bay Area](#)

Alternate Slides



Trigger: Altered space-conditioning system serving existing single-family dwelling

1. Furnace-only replacement → no reach requirement
2. All CA Climate Zones except 15 (Palm Springs, Coachella)
3. Installing **new or replacement** air-conditioner
 - Install a heat pump. Supplemental heating from gas or electric resistance allowed.
OR;
 - Install an AC
 1. Reuse **existing ductwork** + efficiency measures
 2. Replace or install new **ductwork and furnace** + efficiency measures

Energy equivalency test for **unducted** systems (e.g. wall furnaces) not yet performed.

Example 1

Homeowner replaces an old furnace, or installs a heat pump.

Reach Code Requirements:

None.

The homeowner may install new ducts, maintain old ducts, or replace old ducts.

They may also have supplemental gas or electric heating for a heat pump.



Image: Heat Pump

Homeowner installs an AC unit and reuses existing ducts.

Reach Code Requirements:

4 efficiency measures:

1. Higher fan efficacy (0.45 W/cfm)
2. Refrigerant charge verification
3. R-49 attic insulation
4. Air sealing at the ceiling plane



Image: Attic insulation

Homeowner installs an AC unit and new ducts.

Reach Code Requirements:

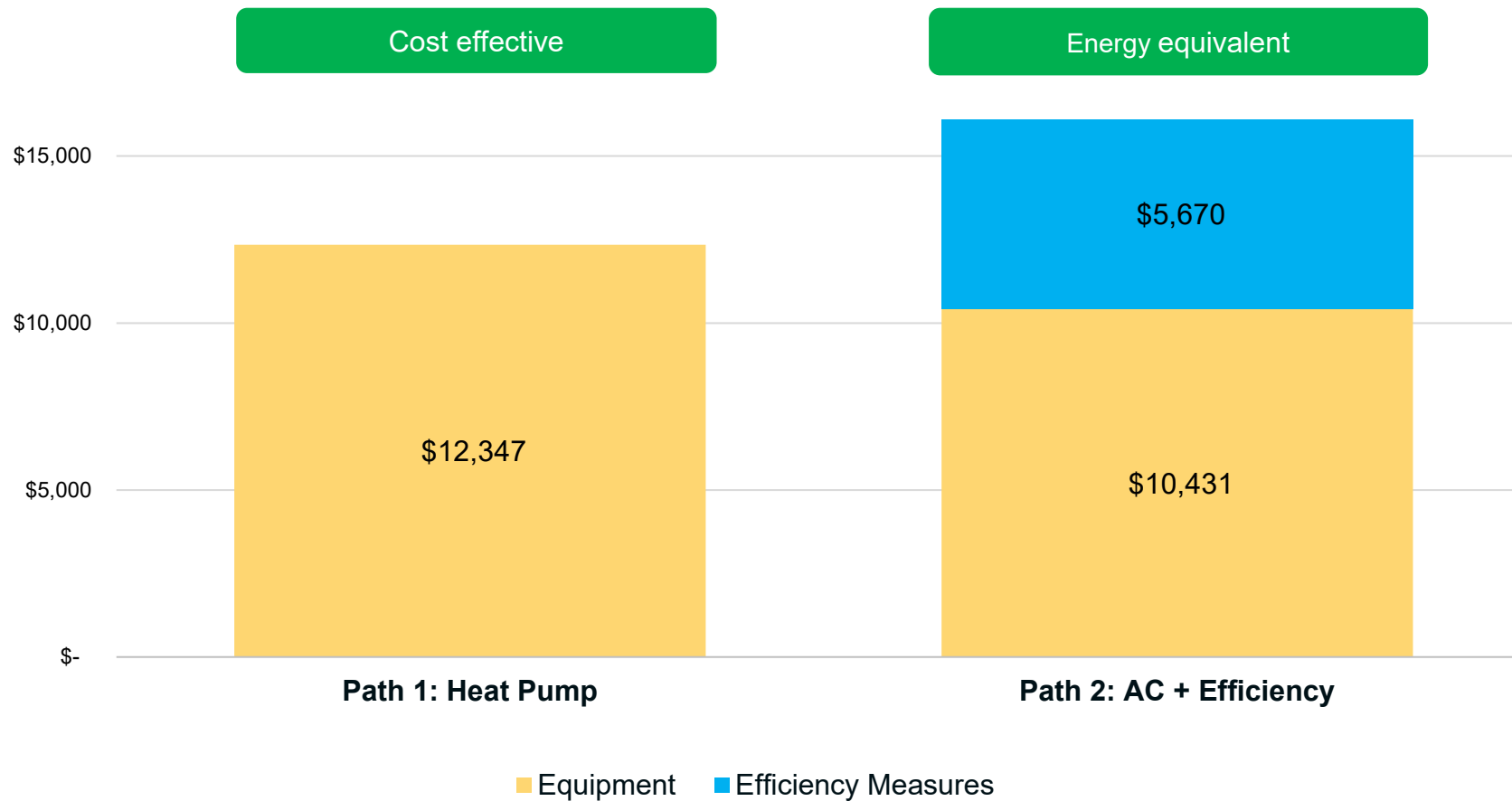
3 efficiency measures:

1. Higher fan efficacy (0.35 W/cfm)
2. Refrigerant charge verification
3. R-8 duct insulation



Image: Duct insulation

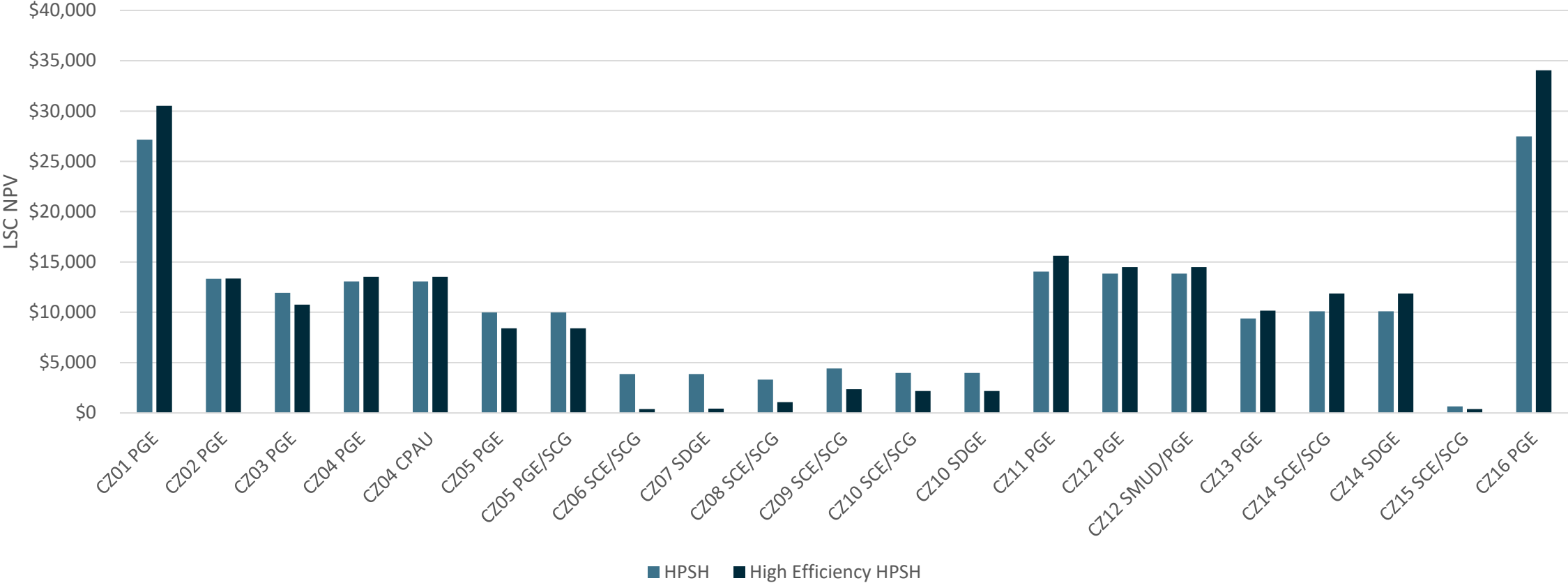
1-Way AC Costs More for The Same Efficiency



Heat Pumps Save \$ Over Time

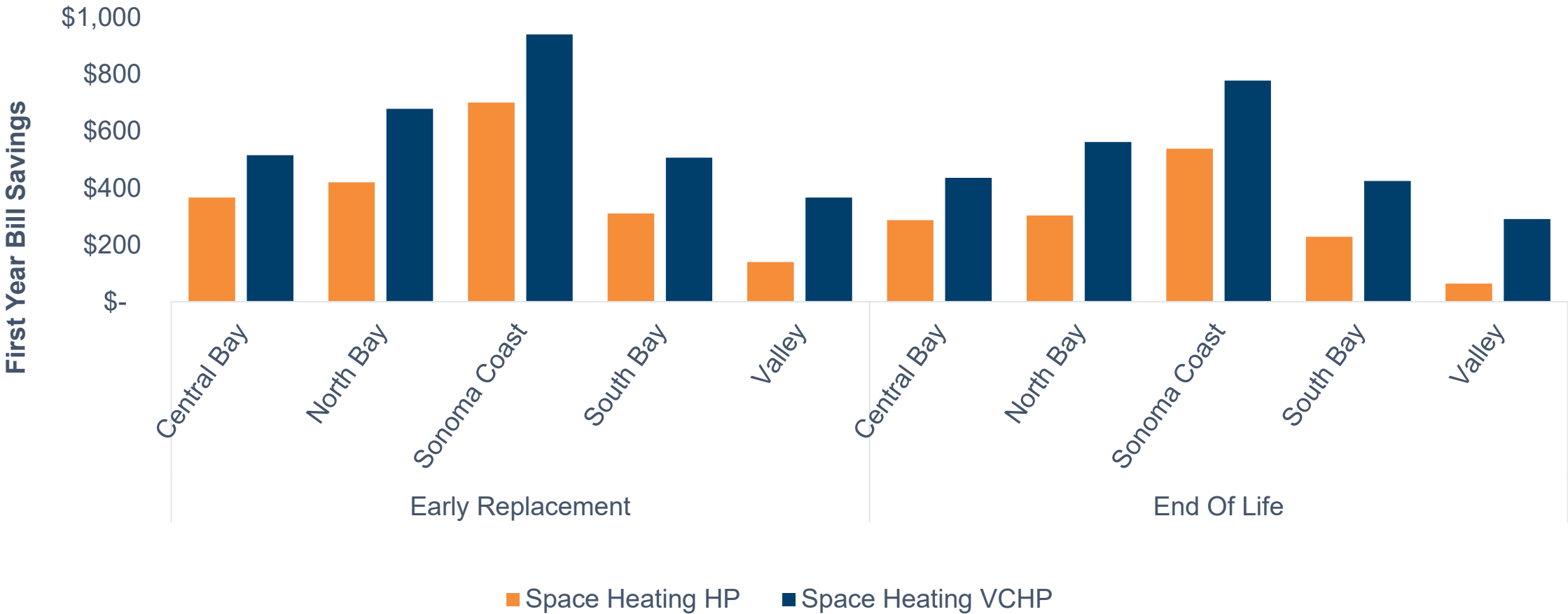


Pre-1978 LSC NPV (30-Year Lifecycle Savings)





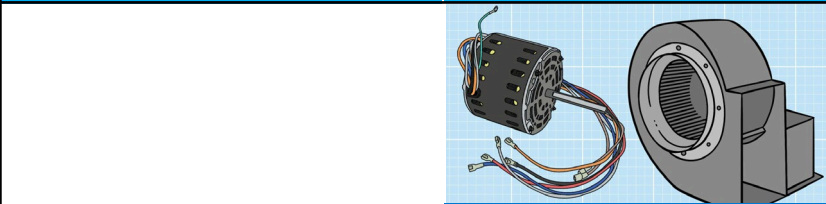
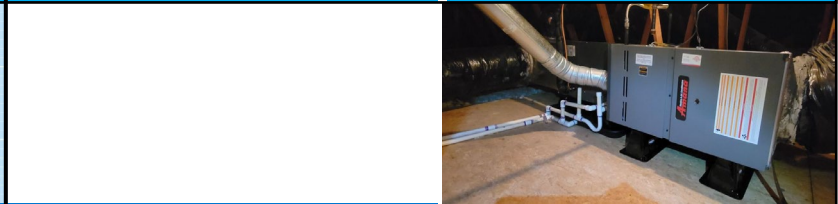
Source: [Statewide IOUs C&S: Single Family Air Conditioner Replacements \(AC to HP\)](#)

Heat Pumps Save \$ Today



Source: Peninsula Clean Energy / Silicon Valley Clean Energy On-Bill Analysis for CZs 1, 2, 3, 4, 12

Lifetime Costs

	PATH 1		PATH 2	
	Scenario	Cost (Present Value)	Scenario	Cost (Present Value)
2026	1. AC fails 2. Install new HP	\$12,300	1. AC fails 2. Install new AC	\$10,400
10 years				
2036	1. Furnace fails 2. Replace fan motor	\$900	1. Furnace fails 2. Install new 95AFUE furnace	\$5,900
5 years				
2041	1. HP fails 2. Install new HP and air handler	\$9,300	1. AC fails 2. Install new AC	\$6,700
TOTAL		\$22,500	\$23,000	

New Heat Pump Only

Duct Insulation:
No Requirement

Duct Sealing:
10% or RA Path

Airflow:
300 CFM/ton or RA
Path

Fan Efficacy:
No requirement

Ref Charge

Solid blue:

Reach over state code

Gradient: Reach in some
CZ

No fill: Same as state code

RA: Reference Appendix

New AC Only

Duct Insulation:
No Requirement

Duct Sealing:
10% or RA Path

Airflow:
300 CFM/ton or RA
Path

Fan Efficacy:
0.45 W/CFM or RA
Path

Ref Charge

Attic Insulation: R-49
Exception: Exist R-38

Air Sealing: Ceiling
Exception: Exist R-38

New Heat Pump and New Ducts

Duct Insulation:
R-6 in CZ 3, 5-7
R-8 in CZ 1, 2, 4, 8-16

Duct Sealing: 5%

Airflow:
350 CFM/ton

Fan Efficacy:
0.58 W/CFM

Ref Charge

Attic Insulation: R-49
CZ 1-4, 6, 8-16 Only.
Exc. R-19 in CZ 1, 3, 6

Air Sealing: Ceiling
CZ 2, 4, 8-16 Only.
Exception - Exist R-19

New AC/Furnace and New Ducts

Duct Insulation: R-8

Duct Sealing: 5%

Airflow:
350 CFM/ton

Fan Efficacy:
0.35 W/CFM

Ref Charge

Attic Insulation: R-49
CZ 1-4, 6, 8-16 Only.
Exc. R-19 in CZ 1, 3, 6

Air Sealing: Ceiling
CZ 2, 4, 8-16 Only.
Exception - Exist R-19