



February 17, 2026

Submitted via email

South Coast Air Quality Management District
Stationary Source Committee
GO ZERO Program
February 20 Committee Meeting
21865 Copley Dr.
Diamond Bar, CA 91765

RE: CALSSA Comments on the GO ZERO Incentive Program Proposal to Include Solar Thermal

Dear Members of the South Coast AQMD Stationary Source Committee,

The California Solar & Storage Association (CALSSA) appreciates the opportunity to provide comments on the proposed updates to the GO ZERO Incentive Program pilot. CALSSA is a trade association dedicated to promoting the deployment of local clean energy technologies and advancing a sustainable energy future in communities throughout California. Our members include businesses that manufacture and install solar thermal systems.

CALSSA commends the South Coast Air Quality Management District (South Coast AQMD) for the successful pilot phase of the GO ZERO Incentive Program and for its continued efforts to improve and expand the program. As South Coast AQMD considers the next phase of GO ZERO, CALSSA urges the District to expand program eligibility to include solar thermal water heating systems.

Solar thermal systems significantly reduce NO_x emissions by displacing the use of other types of fuel, such as natural gas or electricity, in water heating. A study from Flagstaff Research commissioned by CALSSA found that solar water heating with electric backup can reduce greenhouse gas emissions by 90% compared to traditional gas tank water heaters.¹ Additionally, while heat pumps significantly increase electricity usage, solar water heating systems can almost entirely avoid reliance on electricity during peak periods.

Heat pump water heaters rely on electric resistance elements to meet consumer expectations that hot water be recharged quickly. Although heat pumps are most efficient when heating water gradually, real-world usage frequently requires quick reheating, resulting in increased electricity consumption during time-of-use (TOU) peak periods. This can drive higher costs and emissions.

¹ Plaisted, J.R. Assessment of GHG Reduction Technologies for Water Heating Electrification in California. Flagstaff Research, November 2020. Building Decarbonization White Paper, [static1.squarespace.com](https://static1.squarespace.com/static/54c1a3f9e4b04884b35cfef6/t/5fb7f3b49f76f26ca589ff5e/1605891016155/Bldg+Decarb+White+Paper+Nov+2020+%281%29.pdf), <https://static1.squarespace.com/static/54c1a3f9e4b04884b35cfef6/t/5fb7f3b49f76f26ca589ff5e/1605891016155/Bldg+Decarb+White+Paper+Nov+2020+%281%29.pdf>

By contrast, solar water heating systems store thermal energy and can meet hot water demand with little to no additional peak load.

For these reasons, solar thermal water heating systems should be eligible for incentives under the GO ZERO program. Including solar thermal in the GO ZERO Incentive Program would expand access to emissions-reducing technologies while supporting practical, cost-effective decarbonization strategies.

Respectfully,

Dara Yung
Permitting Director
California Solar & Storage Association