Date of Hearing: July 1, 2026

ASSEMBLY COMMITTEE ON LOCAL GOVERNMENT
Juan Carrillo, Chair
SB 222 (Wiener) – As Amended June 15, 2026

SENATE VOTE: 29-8

SUBJECT: Residential heat pump water heater or heat pump HVAC systems

SUMMARY: Establishes limitations on, and requirements for, local agency permitting, inspections and other processes that apply to residential heat pump heating, ventilation, and air conditioning (HVAC) systems and heat pump water heaters, and imposes limitations on common interest developments (CIDs)/homeowners' associations (HOAs) regarding these systems. Specifically, **this bill**:

Provides the following regarding local permitting and inspection processes and other local requirements:

Asynchronous inspections

1) Requires, beginning July 1, 2027, a city, county, or city and county to adopt and offer asynchronous inspections for installations of residential heat pump water heater or heat pump HVAC systems that do not require a licensed contractor and building inspector to be simultaneously present during the inspection.

2) Allows a building inspector to contact the licensed contractor who performed the installation of the heat pump water heater or heat pump HVAC system by telephone call or real-time video conferencing during their inspection.

3) Provides that, if a building inspector determines during an asynchronous inspection that there is an issue with an installation of the heat pump water heater or heat pump HVAC system and that the licensed contractor who performed the installation must be present to perform tests or cure the installation, the building inspector may require the licensed contractor who performed the installation to schedule an additional inspection in which the building inspector and the licensed contractor who performed the installation are both required to be simultaneously present during the additional inspection.

4) Provides that, if a building inspector determines during an asynchronous inspection that a contractor must be onsite in order to allow the building inspector into a place that needs to be inspected, the building inspector may require the licensed contractor who performed the installation to schedule an additional inspection in which the building inspector and the licensed contractor who performed the installation are both required to be simultaneously present during the additional inspection, if deemed necessary by the building inspector.

5) Provides that nothing in this bill's provisions regarding asynchronous inspections shall be construed to require a city, county, or city and county to discontinue offering inspection options for the installation of a residential heat pump water heater or heat pump HVAC

system wherein a building inspector and licensed contractor who performed the installation are simultaneously present.

Nondiscretionary permitting and administrative approvals

6) Provides that, on or before January 1, 2028, a city, county, or city and county may require up to one nondiscretionary permit per installation of a residential heat pump water heater or heat pump HVAC system in which the city, county, or city and county administratively approves an application to install the residential heat pump water heater or heat pump HVAC system. This provision shall not be construed to prevent a city, county, or city and county from issuing separate permits for a panel replacement or structural work conducted as part of the residential heat pump installation.

7) Provides that a city, county, or city and county may require more than one nondiscretionary permit requested by a licensed contractor per installation of a residential heat pump water heater or heat pump HVAC system if the building official makes written findings based upon substantial evidence that the proposed installation would have a specific, adverse impact on public health or safety, and there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact.

Planning, zoning, and workforce labor standards

8) Provides that a city, county, or city and county may apply only any of the following planning or zoning or workforce labor standards on the installation of a residential heat pump water heater or heat pump HVAC system, in addition to any state-level requirements:

    a) Additional standards for setbacks for installations not to exceed 3 feet in side yards and backyards or 10 feet in front yards. If a city, county, or city and county requires the submission of site plans for applications for permits for installations of residential heat pump water heater or heat pump HVAC systems, the city, county, or city and county shall require only site plan information directly relevant to the installation or to determining setback compliance. Site plans shall not be required for applications for permits for a swapout.

    b) Additional standards that conform to local laws, including reach codes, designed to encourage the adoption of zero-emission equipment or improvement of building efficiency.

    c) Additional planning or zoning standards relating to the installation of a residential heat pump water heater or heat pump HVAC system if the city, county, or city and county adopts an ordinance that includes substantial evidence that the standard is designed to mitigate the specific, adverse impact on the public health or safety at the lowest cost possible.

    d) Additional standards to regulate noise in a residential setting for inverter-based heat pump technologies, not to be less than 15 decibels higher than any statutory maximum regulating decibel limits for noninverter-based technologies.

e) Any additional workforce labor standards. For purposes of this provision, "workforce labor standards" include, but are not limited to, the payment of prevailing wages and the employment of apprentices from apprenticeship programs approved by the Division of Apprenticeship Standards.

Plug-in ready systems

9) Prohibits a city, county, or city and county from requiring a permit or inspection for plug-in ready window air-conditioner or window heat pump HVAC systems, provided that all of the following requirements are met:

   a) The appliance has a voltage rating of 120 volts or less.

   b) The appliance is a self-contained unit.

   c) The installation of the appliance does not require the installation of a dedicated circuit for the appliance.

   d) The installation of the appliance does not require an upgrade to the electrical panel to accommodate the additional load of the appliance.

   e) The installation of the appliance does not require the installation of drainage or structural modifications.

Automated permitting for swapouts

10) Requires, on or before July 1, 2028, a city, county, or city and county, to implement an online, automated permitting process that issues permits in real time to a licensed contractor for the installation of a residential heat pump water heater or heat pump HVAC system that meets all of the following criteria:

   a) The installation is for a residential heat pump water heater or heat pump HVAC system that does not require installation of a new electrical panel or structural work.

   b) The installation is a swapout.

   c) If the installation is for a residential heat pump HVAC system, the licensed contractor certifies under penalty of perjury that they have performed a load calculation to properly size the new residential heat pump HVAC equipment per the Air Conditioning Contractors of America Association, Inc. Manual J Residential Load Calculation, the Sheet Metal and Air Conditioning Contractors' National Association Residential Comfort Systems Installation Standards Manual, the California Mechanical Code, or successor provisions, and provides the load calculation to the local authority having jurisdiction upon request.

11) Provides that the methods that a city, county, or city and county may use to comply with the requirements described above regarding swapouts may include, but are not limited to, an automated platform that can issue permits in real time or using an online form-based system that can instantly issue permits upon completion of the online form.

12) Provides that, if a city, county, or city and county requires a CF1R form at the time of the permit application, the city, county, or city and county shall not otherwise require information duplicative to and supplied on the CF1R form provided by the applicant, except for the applicant's name and the residential address of the project.

13) Provides that all liabilities and immunities applicable to cities, counties, and cities and counties shall apply to any permits issued through an online, automated permitting platform and any inspections conducted in connection with those permits, as specified.

14) Provides that this bill's provisions that apply to automated permits for swapouts shall not apply to a city with a population of fewer than 5,000 persons or a county with a population of fewer than 150,000 persons, including each city within that county.

Website posting and electronic permit application requirements

15) Provides that, for an installation of a residential heat pump water heater or heat pump HVAC system, a city, county, or city and county shall publish and make publicly available a list of the requirements adopted pursuant to 8) above, any required permitting documentation, and a list of all relevant fees and fee amounts that may be imposed by the city, county, or city and county on a residential heat pump water heater or heat pump HVAC system, including, but not limited to, permit fees and inspection fees, on their internet website.

16) Requires a city, county, or city and county to allow an applicant to submit a permit application and associated documentation electronically and submit an electronic signature on all forms, applications, and other documentation instead of a wet signature.

17) Provides that this bill's website posting and electronic permit application requirements shall not apply to a city with a population of fewer than 5,000 persons or a county with a population of fewer than 150,000 persons, including each city within that county.

Permit fees

18) Provides that a city, county, or city and county shall not charge a permit fee for a residential heat pump water heater or heat pump HVAC system that exceeds the estimated reasonable cost of providing the service for which the fee is charged, subject to the following limitations:

    a) The permit fee for a residential heat pump water heater system shall not exceed $150.

    b) The permit fee for a residential heat pump HVAC system shall not exceed $200.

19) Provides that this bills requirements regarding permit fees shall not apply to a city with a population of fewer than 5,000 persons and a county with a population of fewer than 150,000 persons, including each city within that county.

20) Provides that the limitations on permit fees imposed by this bill shall not be construed to apply to technology fees charged by third-party vendors for services adopted by jurisdictions to process compliance checks and issue permits.

21) Allows a city, county, or city and county to charge a permit fee for the installation of a residential heat pump water heater or a heat pump HVAC system that exceeds the fee limits in this bill if the city, county, or city and county, as part of a written finding and an adopted resolution or ordinance, provides substantial evidence of the reasonable cost to issue the permit.

22) Requires a permit fee described in this bill to be subject to all of the following requirements:

    a) The fee shall correspond to the typical reasonable cost demonstrated by the city, county, or city and county for the equipment type.

    b) The fee shall be set at a regular fixed amount per appliance type.

    c) The fee shall be listed publicly. A city, county, or city and county shall not apply additional charges above the publicly listed fee.

Other provisions applicable to local governments

23) Provides that, if a city, county, or city and county applies to receive any funding from the State Energy Resources Conservation and Development Commission (Energy Commission), the city, county, or city and county shall self-certify to the commission its compliance with any applicable provisions of this bill.

24) Provides that all of the provisions outlined above do not apply to new residential construction.

25) Provides the following definitions:

    a) "Commission" means the State Energy Resources Conservation and Development Commission, which is also known as the Energy Commission.

    b) "HVAC" means heating, ventilation, and air-conditioning.

    c) "Residential heat pump water heater or heat pump HVAC system" means a single heat pump water heater or heat pump HVAC system that serves one residential dwelling unit.

    d) "Swapout" means a residential heat pump water heater or heat pump HVAC system installation where a new heat pump water heater or HVAC air handler and outdoor coil is being installed in the same location on a property as the prior water heater or air handler and condenser that it is replacing. "Swapout" does not include either of the following:

        i) An installation that requires modification, replacement, or installation of more than 25 linear feet of ductwork.

        ii) An installation that replaces a package unit with a split system or a split system with a package unit.

Provides the following regarding CIDs/HOAs:

26) Provides that any provision of the governing documents, architectural guidelines, or policies shall be void and unenforceable if the provision prevents the replacement of a fuel-gas-burning appliance with an electric appliance that complies with all applicable state and local building codes.

27) Provides that any covenant, restriction, or condition contained in any deed, contract, security instrument, or other instrument affecting the transfer or sale of, or any interest in, real property, and any provision of a governing document, that effectively prohibits or restricts the installation or use of a residential heat pump water heater or heat pump HVAC system is void and unenforceable.

28) Provides that an association shall not prohibit or restrict a member from installing, upgrading, replacing, or using a residential heat pump water heater or heat pump HVAC system in the member's separate interest. The association shall not do any of the following:

    a) Charge any fee to a member in connection with the installation, upgrade, replacement, or use of a residential heat pump water heater or heat pump HVAC system.

    b) Require a member to use a specific residential heat pump water heater or heat pump HVAC system contractor or product.

    c) Claim to receive any rebate, credit, or commission in connection with a member's installation, upgrade, replacement, or use of a residential heat pump water heater or heat pump HVAC system.

    d) Require a member to remove a residential heat pump water heater or heat pump HVAC system or prevent the replacement or upgrade of an existing residential heat pump water heater or heat pump HVAC system.

29) Provides that 28), above, shall not apply if the association establishes either of the following:

    a) The installation, upgrade, replacement, or use of the residential heat pump water heater or heat pump HVAC system would violate federal, state, or local law.

    b) A permit from a designated permitting authority is required for the installation, upgrade, replacement, or use of the residential heat pump water heater or heat pump HVAC system, and that permit is not granted.

30) Requires a residential heat pump water heater or heat pump HVAC system to meet applicable health and safety standards and requirements imposed by law.

31) Provides that nothing in this bill's provision's regarding CIDs/HOAs shall be construed to limit or restrict the ability of an association to require a member whose installation, upgrade, replacement, or use of a residential heat pump water heater or heat pump HVAC system affects the common area or an exclusive use common area to be responsible for the repair of any damage to the common area or an exclusive use common area, or to another member's

separate interest, that is caused by the installation, operation, maintenance, or removal of that residential heat pump water heater or heat pump HVAC system.

Provides the following additional provisions:

32) Finds and declares that the oversight of permitting for residential heat pump water heater and heat pump HVAC systems is a matter of statewide concern and is not a municipal affair as that term is used in Section 5 of Article XI of the California Constitution. Therefore, this bill applies to all cities, including charter cities.

33) Contains additional findings and declarations regarding its purpose.

34) Provides that no reimbursement is required by this bill pursuant to Section 6 of Article XIII B of the California Constitution for certain costs that may be incurred by a local agency or school district because, in that regard, this bill creates a new crime or infraction, eliminates a crime or infraction, or changes the penalty for a crime or infraction, or changes the definition of a crime within the meaning of Section 6 of Article XIII B of the California Constitution. However, if the Commission on State Mandates determines that this bill contains other costs mandated by the state, reimbursement to local agencies and school districts for those costs shall be made, as specified.

FISCAL EFFECT: According to the Senate Appropriations Committee, pursuant to Senate Rule 28.8, negligible state costs.

COMMENTS:

1) **Author's Statement**. According to the author, "Californians need relief from sky-high energy costs and the extreme temperature changes driven by climate change, and heat pumps are an essential solution to both problems. Unfortunately, the permitting process for heat pumps is deeply broken, making homeowners suffer long waits, high fees, and needless hoops just to install a heat pump.

   "SB 222, The Heat Pump Access Act, will create a standardized permitting process across the state that is faster, simpler, and cheaper for homeowners and contractors. Making these dual-use, zero-pollution air filtration and HVAC systems more accessible will help Californians build climate resilience and speed the recovery of communities impacted from climate disasters, such as Los Angeles. Updating the permitting process is also an essential step to help the state meet its goals of installing 6 million heat pumps by 2030, and achieving carbon neutrality by 2045."

2) **Background**. Heat pump technology offers fossil fuel-free alternatives to traditional gas water heaters and HVAC systems. Heat pumps operate like a refrigerator or standard air-conditioner unit by moving heat contained in the air from one place to another by compressing fluid to heat it up, then pumping it away. Heat pump HVAC units operate in two directions, so that heat can be transferred away when cooling is desired or brought inside when heating is needed. Heat pump water heaters operate similarly to transfer heat from the air around the unit into the tank where water is heated.

In 2022, Governor Gavin Newsom established a goal of installing six million heat pumps in California by 2030. As of December 2024, the state had an estimated 1.9 million heat pumps installed, according to a 2025 report by the California Heat Pump Partnership. That report noted, "at the current rate of heat pump adoption, the state is projected to reach only 4 million heat pumps by 2030, falling 2 million units short of the state's 6 million heat pump target."

3) **Heat Pump Permitting**. Although specific procedures vary by jurisdiction, the process for approving a permit to install a heat pump water heater or heat pump HVAC system is similar to the process for approving a permit for other types of HVAC systems or water heaters. Typically, the installer submits information regarding the mechanical equipment that will be installed and an electrical diagram to the city or county building department. If the plan is approved, the installer or customer pays a permit fee, receives a permit, and starts the installation project.

   Some local governments currently offer instant online permitting of certain installations water heaters or HVAC systems, including, among others, the Cities of Belmont, Irvine, Lancaster, Modesto, Oakland, San Francisco, San Jose, Santa Clarita, and Vacaville. These jurisdictions use software platforms developed by private third parties.

   Reports by the California Heat Pump Partnership and the San Francisco Bay Area Planning and Urban Research Association (SPUR) cite permitting as one obstacle to installing heat pump water heaters or HVAC systems. These reports name permitting issues that include differing approval processes, timelines, and costs for approval of permits for heat pump water heaters and HVAC systems across California. For example, according to SPUR, "more than half of California's jurisdictions took an average of 5.9 days to issue heat pump water heater permits statewide, though nearly half of jurisdictions issued most permits within a day. Post-installation inspections can be a time suck because in some cities contractors may end up waiting on-site for the inspector to arrive within a four-hour window."

   These reports note that heat pump water heaters and HVAC systems face unique permitting obstacles relative to gas-fueled appliances because they are often partially paid for by rebates or other funding programs that require a permit, whereas gas appliances that do not benefit from these programs may be installed illegally without permits.

4) **Permit Streamlining for Solar Energy Systems**. In recent years, the Legislature has enacted numerous laws to remove permitting barriers to electrification efforts, including a series of bills to ease the permitting process of solar energy systems, such as solar photovoltaic (PV) systems, that collect, store, and distribute solar energy for heating, cooling, and electricity generation.

   In 2014, the Legislature required local governments to streamline their permitting processes for certain solar systems (AB 2188, Muratsuchi). AB 2188 requires every city and county, including charter cities, to adopt an ordinance that creates an expedited, streamlined permitting process for small residential rooftop solar energy systems.

   AB 2188 requires each city and county to develop a checklist of all requirements that allow rooftop solar energy systems to be eligible for expedited review and requires them to approve all complete applications that meet the requirements of the checklist. A city or county must

publish its application checklist and document requirements on a publicly accessible Internet Web site if the local agency maintains one, and to allow for the electronic signature on all forms, applications and other documents unless the city or county determines that it is unable to accept electronic signatures. Cities and counties must accept permit applications and all associated documents via email, the internet, or fax.

AB 2188 also limits local governments to administrative—nondiscretionary—review of solar energy system permits. Local governments cannot review permits based on standards other than health or safety, so they cannot require design review. Under AB 2188, only one inspection may be required for small residential rooftop solar energy systems that qualify for expedited review. Local officials must permit the system unless they find a specific, adverse impact on public health or safety that cannot be mitigated.

State law also requires cities and counties to make all documentation and forms associated with the permitting of advanced energy storage, such as battery systems, available online (AB 546, Chiu, 2017). The city or county must also allow for electronic submittal and signatures of a permit application, much as is required for solar energy system permitting.

Additionally, state law caps the fees that cities and counties may charge to permit solar energy systems at $450 plus $15 per each kilowatt (kW) above 15 kW for residential systems and $1,000 plus $5-7 per each kW over 50 kW for commercial systems. These fee caps were most recently extended through January 1, 2034 by AB 1132 (Friedman, 2023).

Finally, in 2022, the Legislature required cities and counties to implement an online, automated permitting platform that verifies code compliance and issues permits in real time to a licensed contractor for specified solar energy systems (SB 379, Wiener, 2022). SB 379 exempted cities with populations of fewer than 5,000 and counties with a population of fewer than 150,000. As of September 30, 2024, all other cities and counties were required to comply with SB 379.

5) **Bill Summary**. This bill establishes several requirements for, and places a number of limitations on, local governments and CIDs regarding residential heat pump installations. These include:

   a) **Asynchronous Inspections**. This bill requires a city or county to adopt and offer asynchronous inspections for installations of residential heat pump systems that do not require the contractor and building inspector to be simultaneously present during the inspection. The building inspector may contact the contractor by phone call or real-time video conferencing during the inspection. The building inspector may require the contractor to schedule an additional inspection in which the building inspector and the contractor are simultaneously present if the building inspector determines there is an issue that requires the contractor to be present to remedy the issue or to allow the building inspector into an area that needs to be inspected.

   b) **Non-discretionary Permitting and Approvals**. This bill provides that, beginning January 1, 2028, a city or county may require up to one nondiscretionary permit per installation of a residential heat pump system in which the city or county administratively approves an application to install the residential heat pump system. A city or county may still require separate permits for a panel replacement or structural work conducted as part

of the residential heat pump system installation. A city or county may also require more than one nondiscretionary permit requested by a licensed contractor per installation if the building official makes written findings that the proposed installation would have a specific, adverse impact on public health or safety and there is no feasible method to satisfactorily mitigate or avoid the adverse impact.

c) **Planning, Zoning, and Workforce Labor Standards**. This bill limits a city or county's application of planning or zoning or workforce labor standards on the installation of a residential heat pump system that are in addition to any state-level requirements to the following:

   i) Additional standards for setbacks for installations not to exceed 3 feet in side yards and backyards or 10 feet in front yards. Any site plans required by the city or county must be limited to information directly relevant to the installation or to determine setback requirements. Site plans shall not be required for swapouts.

   ii) Additional standards that conform to local laws, including reach codes, designed to encourage the adoption of zero-emission equipment or improvement of building efficiency.

   iii) Additional planning or zoning standards relating to the installation of a residential heat pump system if the city or county adopts an ordinance that includes substantial evidence that the standard is designed to mitigate the specific, adverse impact on the public health or safety at the lowest cost possible.

   iv) Additional standards to regulate noise in a residential setting for inverter-based heat pump technologies, as specified.

   v) Any additional workforce labor standards (e.g., payment of prevailing wages, employment of apprentices from apprenticeship programs, etc.).

d) **Plug-in Ready Systems**. This bill prohibits a city or county from requiring a permit or inspection for plug-in ready window air conditioners or window heat pump HVAC systems that meet specified requirements for voltage and self-containment, and that do not require dedicated circuits, electrical panel upgrades, or installation of drainage or structural modifications.

e) **Automated Permitting for Swapouts**. This bill requires cities and counties exceeding specified population thresholds to implement an online, automated permitting process by July 1, 2028, that issues permits in real time to a licensed contractor for the installation of swapouts that do not require new electrical panel or structural work and that meet additional conditions regarding certification of load calculations. Cities and counites cannot require information duplicative to a CF1R form except the applicant's name and the address of the project. The bill provides certain liability and immunity protections to cities and counties for these permits and related inspections.

f) **Website Posting and Electronic Permit Applications**. This bill requires cities and counties exceeding specified population thresholds to publish and make publicly available a list of the required planning or zoning or workforce standards, any required

permitting documentation, and a list of all relevant fees and fee amounts that may be imposed by the city or county on a residential heat pump system installation on their internet website. These cities and counties must also accept permit applications electronically.

g) **Permit Fees**. This bill limits the permit fees that cities and counties exceeding specified population thresholds may impose to $150 for a residential heat pump water heater system and $200 for a residential heat pump HVAC system. A city or county may charge a permit fee that exceeds these limits if it provides substantial evidence of the reasonable cost to issue the permit as part of a written finding and an adopted resolution. Permit fee caps do not apply to technology fees charged by third parties for services to process compliance checks and issue permits. The bill outlines additional parameters for permit fees, as specified.

h) **Exemptions**. This bill exempts cities with a population of fewer than 5,000 persons and a county with a population of fewer than 150,000 persons, including each city within that county, from the online automated permit issuance provisions, the permit fee cap provisions, and the public posting provisions outlined above. This bill also specifies that its requirements and limitations related to residential heat pump systems do not apply to new residential construction.

i) **Energy Commission Funding**. This bill requires a city or county to self-certify to the Energy Commission its compliance with any applicable provisions outlined above if a city or county applies to receive any funding from the Energy Commission.

j) **Requirements for CIDs/HOAs**. This bill provides the following for CIDs/HOAs:

   i) Any provision of the governing documents, architectural guidelines, or policies shall be void and unenforceable if the provision prevents the replacement of a fuel-gas-burning appliance with an electric appliance that complies with all applicable state and local building codes.

   ii) Any covenant, restriction, or condition contained in any deed, contract, security instrument, or other instrument affecting the transfer or sale of, or any interest in, real property, and any provision of a governing document, that effectively prohibits or restricts the installation or use of a residential heat pump water heater or heat pump HVAC system is void and unenforceable.

   iii) An association shall not prohibit or restrict a member from installing, upgrading, replacing, or using a residential heat pump water heater or heat pump HVAC system in the member's separate interest. The association shall not do any of the following:

      (1) Charge any fee to a member in connection with the installation, upgrade, replacement, or use of a residential heat pump water heater or heat pump HVAC system.

      (2) Require a member to use a specific residential heat pump water heater or heat pump HVAC system contractor or product.

(3) Claim to receive any rebate, credit, or commission in connection with a member's installation, upgrade, replacement, or use of a residential heat pump water heater or heat pump HVAC system.

(4) Require a member to remove a residential heat pump water heater or heat pump HVAC system or prevent the replacement or upgrade of an existing residential heat pump water heater or heat pump HVAC system.

iv) Provides that iii) shall not apply if the association establishes either of the following:

(1) The installation, upgrade, replacement, or use of the residential heat pump water heater or heat pump HVAC system would violate federal, state, or local law.

(2) A permit from a designated permitting authority is required for the installation, upgrade, replacement, or use of the residential heat pump water heater or heat pump HVAC system, and that permit is not granted.

v) Requires a residential heat pump water heater or heat pump HVAC system to meet applicable health and safety standards and requirements imposed by law.

vi) Provides that nothing in this bill's provision's regarding CIDs/HOAs shall be construed to limit or restrict the ability of an association to require a member whose installation, upgrade, replacement, or use of a residential heat pump water heater or heat pump HVAC system affects the common area or an exclusive use common area to be responsible for the repair of any damage to the common area or an exclusive use common area, or to another member's separate interest, that is caused by the installation, operation, maintenance, or removal of that residential heat pump water heater or heat pump HVAC system.

This bill is sponsored by the Bay Area Air District, the Building Decarbonization Coalition Action Fund (BDC), and the San Francisco Bay Area Planning and Urban Research Association (SPUR).

6) **Arguments in Support**. The Bay Area Air District, the Building Decarbonization Coalition Action Fund (BDC), and the San Francisco Bay Area Planning and Urban Research Association (SPUR), co-sponsors of this bill, write, "California has set some of the nation's most ambitious targets to reduce carbon emissions, including a goal to install 6 million heat pumps statewide. This leaves 5 years to deploy over 4 million heat pumps—which will require quadrupling the current rate of installation. A heat pump installed in California today will cut emissions from space heating by 93% over the lifetime of the equipment compared to a gas furnace. In order to meet our climate and clean air targets, the state must make it easy, fast, and affordable for customers to install heat pump appliances. Additionally, heat pumps are a critical solution to the state's energy affordability crisis…

"In the spirit of meeting these goals, California has dedicated hundreds of millions of dollars to incentive programs, such as TECH Clean California, and the Equitable Building Decarbonization program, to reduce the up-front cost of electric appliances. These programs require applicants to secure an installation permit in order to be eligible for a rebate or direct install.

"Unfortunately, the process for securing building permits in California is notoriously complex. Installation standards can vary significantly by jurisdiction, creating a patchwork of confusing and opaque requirements that are difficult for contractors and consumers to comply with. California has taken steps to standardize and clarify the permitting process for many industries, including housing (SB 35, Wiener), rooftop solar (SB 379, Wiener; AB 1132, Friedman), and electric vehicle charging (AB 1236, Chiu; AB 970, McCarty). However, beyond state building code, no such clarity exists for permitting heat pump water heaters and heat pump HVAC systems.

"Permitting adds to an installation's total price in a number of ways. Interviews with heat pump installers point to permitting and inspection fees that can range from as low as fifty dollars to as high as several thousand, depending on both the jurisdiction and the size of the project. Completing the documentation required to secure a permit can also significantly drive up an installation's soft costs. Extensive plan review, site maps, unit specifications, and property surveys can add thousands of dollars to the customer's bill, even for simple appliance swapouts.

"Long timelines for permit approval can also drive up soft costs and push customers towards unpermitted work. While some jurisdictions are able to turn around heat pump permits and installations within 48 hours (such as through the City of Palo Alto's emergency water heater replacement program), contractors have cited waiting for months to receive permits in other municipalities due to extensive plan review and multiple inspections. After the permit is approved, installers also cited long time windows for scheduling inspections, often leading to significant lost labor hours.

"Homeowners typically replace a water heater or HVAC system only when their old one breaks. Onerous permitting timelines or costs can drive many to install an appliance unpermitted, rather than go without hot water, heating, or cooling for weeks or months at a time. To drive electric appliance adoption and achieve cost-parity with fossil fuel appliances, California must address heat pump permitting.

"The Heat Pump Access Act will take a comprehensive approach to standardizing the permitting process for heat pump installations statewide, reducing time constraints and lowering costs for contractors and consumers alike. SB 222 will limit the ability of local jurisdictions to impose code conditions or excessive cost on heat pump installations that go beyond state building standards; require maximum one permit for heat pump water heater installations; and prohibit HOAs from imposing architectural review standards that will prevent clean appliance adoption. SB 222 also requires jurisdictions to put in place an automated permitting process for standard heat pump swapouts, in line with previous efforts by the state to require automated permitting for solar and EV charging installations.

"SB 222 does not preclude local jurisdictions from recovering the costs of implementing this measure. Under SB 222, jurisdictions are permitted to exceed fee caps if necessary, as long as the new fee is a flat fee that is clearly posted online. Some automated permitting services, such as Symbium, provide their services to cities completely free. These measures will give Californians clarity and consistency as to the cost required to install a heat pump, without posing an undue burden on cities."

7) **Arguments in Opposition**. The League of California Cities (Cal Cities), the California State Association of Counties (CSAC), and the Rural County Representatives of California (RCRC), in opposition, write, "Our members are actively working with their communities to improve energy efficiency and encourage the adoption of advanced water heating technologies. While we appreciate the recent amendments to SB 222, specifically allowing local building inspectors to determine the appropriateness of an asynchronous inspection, the legislation remains premised on the notion that local permitting is a significant barrier to adoption. The state's own research demonstrates otherwise.

"The California Public Utilities Commission (CPUC) commissioned California Water Heating Market Study identified two primary barriers to homeowner adoption of heat pump water heaters: emergency replacement situations and high upfront costs. Notably, local permitting did not emerge as a significant barrier to consumer adoption.

"According to the study, installers reported that nearly half of all water heater replacements occur during emergency failures, while other research cited in the report estimates the share may be as high as 90 percent. When a household loses hot water, homeowners are understandably focused on restoring service as quickly as possible. Faced with the prospect of electrical upgrades, retrofit work, contractor coordination, and higher equipment costs, many consumers choose the fastest and least expensive replacement option available.

"The study further found that installers consistently identified the higher upfront cost of heat pump water heater systems as a major obstacle. Industry sources similarly report installation costs for energy efficient HVAC and heat pump systems ranging from $5,000 to $15,000 or more, often excluding necessary electrical upgrades (new panel). For many older homes, panel upgrades and dedicated circuits can add thousands of dollars to the total project cost. These costs, not permit fees, are what drive consumer decisions.

"Local permitting is not a barrier to electrification; rather, it is the mechanism through which cities ensure installations are safe, code-compliant, and appropriate for local conditions. Establishing a state-dictated permitting framework for HVAC systems sets a troubling precedent for future preemption of local building, zoning, and land-use authority. Moreover, permit fees are already limited by law. Cities and counties may only charge fees that reflect the reasonable cost of providing the service, a principle reaffirmed by Proposition 26. A permitting authority that exceeds a reasonable amount or who cannot justify their fee amount is already against the law so additional safety guardrails are unnecessary.

"If the Legislature's goal is to accelerate adoption, it should focus on the barriers identified by its own research. The California Energy Commission's Home Electrification and Appliance Rebates (HEEHRA) program demonstrated substantial consumer demand for financial assistance ($8,000 rebates) but has exhausted available funding. Expanding rebate and incentive programs would directly address the primary obstacle identified by homeowners and contractors alike: affordability.

"Finally, SB 222 would impose new mandates on local governments by requiring automated permitting systems regardless of whether a jurisdiction already processes these permits efficiently. Many cities currently issue these permits over the counter or through expedited review. The bill would nevertheless require local agencies to incur new software,

implementation, training, maintenance, and administrative costs without evidence that such expenditures will materially increase adoption rates.

"SB 222 seeks to solve an affordability problem through a permitting mandate. The state's own research demonstrates that homeowners are constrained primarily by the high upfront costs of equipment, electrical upgrades, and emergency replacement circumstances, not local permitting processes. Rather than imposing new mandates on local governments, the Legislature should focus its efforts on expanding consumer incentives and rebate programs that directly address the barriers identified by contractors, homeowners, and the CPUC itself."

8) **Double-Referral**. This bill is double-referred to the Housing and Community Development Committee, where it passed on a 10-0 vote on June 24, 2026.

REGISTERED SUPPORT / OPPOSITION:

Support

Bay Area Air Quality Management District [CO-SPONSOR]
Building Decarbonization Coalition Action Fund [CO-SPONSOR]
San Francisco Bay Area Planning and Urban Research Association [CO-SPONSOR]
350 Humboldt County
350 Sacramento
ACT Now Bay Area
Activesgv
Air-conditioning Heating and Refrigeration Institute
Applied Building Science
Association for Energy Affordability
Ava Community Energy
Bauhaus Productions Consulting
Berkeley City Councilmember Igor Tregub
California Environmental Voters
California Interfaith Power & Light
Carbon Free Palo Alto
Carbon Free Silicon Valley
Catholic Charities of Stockton
Center for Biological Diversity
Ceres
Chair, Board of Equalization Sally Lieber
Citizens Climate Lobby Long Beach
City of San Jose
City of San Jose Councilmember David Cohen,
City of Walnut Creek Mayor Kevin Wilk
Climabridge
Climate Action California
Climate Future California
Climate Health Now Action Fund
Climate Reality Project, Orange County Chapter
Climate Resolve

Community Action to Fight Asthma
Councilmember Alison Hicks, City of Mountain View
Daikin U.S. Corporation
Dayenu: a Jewish Call to Climate Action
Earthjustice
Efficiency First California
Electrify My Home
Evergreen Action
Friends Committee on Legislation of California
Gradient
Green Building Initiative
League of Women Voters of California
Lutheran Office of Public Policy - California
Mothers Out Front Silicon Valley
Natural Resources Defense Council
Quitcarbon
Redwood Energy
Regional Asthma Management and Prevention (RAMP)
Resource Renewal Institute
Rewiring America
Rising Sun Center for Opportunity
San Diego Building Electrification Coalition
San Francisco Climate Emergency Coalition
Sierra Business Council
Smart Western States Council
Solano County Democratic Central Committee
Stopwaste
The Climate Center
The Climate Reality Project Orange County Chapter
The Climate Reality Project, California State Coalition
The Climate Reality Project, Los Angeles Chapter
The Climate Reality Project, Sacramento Chapter
The Climate Reality Project, San Diego Chapter
The Climate Reality Project, San Fernando Valley CA Chapter
The Climate Reality Project: Silicon Valley
US Green Building Council California
Vice Mayor City of Menlo Park Jennifer Wise

Opposition

California State Association of Counties
California State Pipe Trades Council
City of Camarillo
City of Thousand Oaks
Community Associations Institute - California Legislative Action Committee (unless amended)
League of California Cities
Rural County Representatives of California

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