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350 Bay Area Comments on the 2019 Building Efficiency Standards

350 Bay Area Comments on the 2019 Building Efficiency Standards discussed at the February 5, 2018 Lead Commissioner CEC Hearing

350 Bay Area is a non-profit organization working for deep reductions in greenhouse gases and carbon pollution through socially equitable solutions in the Bay Area and beyond. 350 Bay Area challenges legislators and agencies to take urgent strategic action to address the climate crisis before the impact and mitigation costs become even higher. Founded in 2012, 350 Bay Area represents more than 22,000 people, primarily concentrated in the nine Bay Area counties. We are concerned that the proposed 2019 Building Efficiency Standards do not adequately address the urgency of the moment and the need to quickly decarbonize our built environment.

Natural gas is not a bridge fuel. The lifecycle cost of natural gas is high because methane escapes throughout the production and distribution lifecycle and the the magnitude of the impact is significant even if short-lived: it is as detrimental to the state meeting its climate goals as coal. Most of these costs to the environment are externalized, shifted to the public and not paid by the fossil fuel companies or included in the â€œpriceâ€ of natural gas. However the costs are real and are currently paid by the residents of California. Therefore, as a public agency of the state of California, the CEC should avoid bias in favor of natural gas, and incorporate available estimates of the social cost of carbon (SCC) in cost accounting.

De-carbonizing electricity generation must be met with equally ambitious policies to speed the electrification of transportation and buildings, including space and water heating. These electrification policies will be meaningless if they are not fully implemented and enforced. The CEC, and this proceeding in particular, is also central to another key policy pillar -- increased energy efficiency. Energy efficiency can balance that trend by increasing energy conservation, and contributing to load shifting to minimize peak load in our electrical grid.

Our specific comments:
Because of the importance of grid interconnection for ZNE buildings, including load shifting, we strongly support the CEC section 110.12(a) requiring an open ADR 2.0 standard. While we enthusiastically support tapping all of the innovation of our technology partners, we recognize the wisdom of requiring a parallel â€œopen systemâ€ interface in addition to whatever proprietary links to the cloud are being used. While grid security and privacy are important, it is also important that there not be stranded assets for building owners in what is a rapidly evolving and changing field.

These biennial updates should not be pro forma. They provide a real opportunity to take what is emerging from science and California policy and make necessary changes in the code. It is most unfortunate that apparently TDV methodology has been continued for another two years, given its clear bias in favor of natural gas. If the CEC is serious about California's climate change policy it will do everything feasible in this year's title 24 update to assure a level playing field, or better, a playing field which recognizes the real costs of continued investment in natural gas infrastructure. We strongly urge that the update emphasize the following:

1) All buildings must be electrification ready.

2) Establishing an accurate cost accounting for natural gas, including the cost of new infrastructure for homes not currently using natural gas. All cost effectiveness analyses should use the Social Cost of Carbon (SCC) determined

by an independent scientifically credible transparent process, consistent with what the California Air Resources Board uses for SCC.

3) It is important to recognize the key role of heat pump water heaters (HPWH) for both energy efficiency gains and for their potential to provide valuable grid services such as load shifting when connected to the grid, not just drain-water heat recovery systems. Section 150.1 (c) 8A should be rewritten to exclude the requirement for additional rooftop solar PV kW when new construction includes a grid connected HPWH. This requirement creates an unnecessary disincentive since a grid-connected HPWH can offset higher generation needs given its potential for thermal storage.