



October 28, 2011

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Commissioner Karen Douglas
California Energy Commission
Dockets Office, MS-4
Re: Docket No. 10-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512

**Re: October 13 and 14, 2011 Workshop – 2013 Building Energy Efficiency Standards
Docket Number 10-BSTD-01**

Dear Commissioner Douglas:

I am writing to convey Sierra Club California's strong support for the proposed 2013 Title 24 Part 6, Building Energy Efficiency Standards, which will reduce energy use in California's new and renovated buildings for decades.

Commercial and residential buildings are responsible for 60% of California's natural gas use, 70% of electricity use, and 80% of peak demand¹. With population growth projections of 12% over the next eight years², California will experience significant additions to its building stock. The code also covers the extensive building activity tied to major remodels and additions.

Buildings lock in energy use for their 30 to 50 year average life spans, so it is critically important for them to be energy efficient when first constructed. California needs an aggressive building energy code to reduce future energy use and demand on existing infrastructure. Investments in energy efficiency continue to be far less expensive than the cost of electricity production from renewable energy or fossil fuels. California's ability to meet its requirements from AB32 (California's law that requires significant reductions in greenhouse gas emissions) and achieving its 33% Renewable Portfolio Standard will be less expensive by reducing and preventing further energy demands attributed to buildings. Additionally the state's zero net energy goals for residential construction beginning in 2020 require that this code cycle and the next adopt every cost effective energy efficiency measure.

¹ <http://www.energy.ca.gov/2007publications/CEC-200-2007-015/CEC-200-2007-015-SF2.PDF>

² <http://www.dof.ca.gov/research/demographic/reports/view.php#objCollapsiblePanelProjectionsAnchor>

The proposed standards will provide significant economic and environmental benefits including:

- Avoid the need for 8 new large powerplants and associated transmission and distribution system in 30 years assuming the housing starts remain at the current depressed levels, or as high as 16 powerplants avoided if the housing starts revert back to the 2006 levels.
- With statewide average costs of \$2,941, and total life cycle cost savings of \$8,554, the net savings are \$5,613 for a residential building over the 30 year life of the building.
- Statewide average levelized life cycle costs of \$12 and savings of \$36 for a “typical” residential unit per month. The savings are greater in high cooling demand zones in the central valley and the desert areas of California where rapid population growth spurs the State’s peak summer electricity load.
- 300,000 tons of CO2 reduction in the first year

These benefits are achievable through important requirements such as improved envelopes from cool roofs, increased insulation values, and blower door testing of infiltration.

Given the massive benefits of the proposed standards and their cost effectiveness as demonstrated by your agency, we urge the CEC to move forward and adopt the 2013 Title 24 update as proposed in an expeditious manner. Reducing the energy, environmental and health impacts of the built environment through strong energy building codes will help California retain its leadership role in environmentally sound building construction and provide dividends to future generations for many years to come.

Thank you for your consideration,



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