

DOCKETED

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June 29, 2018

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Dr. Robert B. Weisenmiller
Chair, California Energy Commission
1516 9th Street
Sacramento, CA 95814

RE: ACHIEVING ZERO EMISSION BUILDINGS, DOCKET NUMBER 18-IEPR-09—AVBOT COMMENTS

Dr. Weisenmiller,

The Antelope Valley Board of Trade is writing to submit our commences and express our strong opposition to the legislative and regulator efforts being considered to achieve zero emission building. Earlier this year, our Board opposed AB 3001 (Bonta) and AB 3232 (Friedman). As authored, AB 3001 would require new residential and nonresidential buildingsⁱ beginning in 2022 and would issue mandate to the Public Utilities Commission (PUC) to develop a tariff option offering residential and commercial rates that promote energy efficiency. Similarly, AB 3232 would mandate your Energy Commission, by January 1, 2020, to require all new residential and nonresidential building built on or after January 1, 2030, to be zero-emission building and develop a strategy to reduce the emission of greenhouse gases from the state-s residential and non residential building stock to at least 50% below 1990 levels by January 1, 2030.

The vast majority of Californians currently use natural gas as their preferred energy source for cooking, space and water heating. Most families here in the Antelope Valley already struggle to shoulder the financial burden of cooling their homes in the summer. These legislative and regulator efforts to achieve zero emission building would effectively limit consumer choice and essentials compel residential and commercial property owners to use electricity for all end-uses, regardless of what people want or the increased cost to consumers. As our county continues to grapple with high levels of poverty and a low supply of new homes, now is not the time for the Legislature or the state's regulator agencies to promote policies that will likely add to the cost of monthly utility bills and simultaneously stifle a sluggish construction market with more unnecessary regulation.

According to the latest edition of the California Greenhouse Gas (CHG) Emission Inventory, released by the California Air Resources Board on June 6, 2017, residential units account for only 6% of GHG emissions



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state-wide while commercial units account for only 5% of total GHG Emissions. The changes proposed by the Legislature and state regulatory agencies of achieving zero emission buildings represent a misguided and costly effort to chase emissions reductions that, on their own, would not substantially improve California's air quality and environment. Furthermore, given the Legislature's current push to address rampant homelessness across California and the overall lack of affordable housing, AB 3001, AB 3232 and other proposed regulatory changes seem misguided, regressive, and heavy-handed incursions that will only serve to hamper, rather than help, the state's housing policy efforts.

For the Sake of all Californians, the Antelope Valley Board of Trade respectfully requests that you seriously consider the long-term implication of mandating zero emission buildings and find an incremental and diverse solution to reducing emissions throughout the state. Please contact Anna Lee Buehn, AVBOT Executive Director, at anna@avbot.org or 661-947-9033 if you have any questions or concerns.

Thank you.

Sincerely,

Ed Knudson
 President
 Antelope Valley Board of Trade

President
 Antelope Valley College

cc: Honorable Members of the California Energy Commission
 Honorable Members of the California Public Utilities Commission
 Darby Kernan, California State Association of Counties
 Paul Yoder, Shaw/Yoder/Antwih

“Electric-ready buildings” means buildings containing electric infrastructure necessary to enable building occupants to use electrical equipment in lieu of natural gas-fired equipment, such as space and water heating equipment.