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## All-electric baseline for commercial buildings is needed

To whom it may concern,

My company is a sustainability consulting firm working on buildings in California. I request that the Energy Commission create an independent baseline for all-electric commercial and multifamily buildings to create a level playing field for electric heating and hot water, and stop artificially favoring gas. Electric systems now have lower greenhouse gas emissions than gas based on improvements to California's grid, and are often more cost effective to build and operate. However Title 24 still penalizes all-electric buildings in favor of gas, in direct opposition to real-world environmental impact. Please make this change now to allow all-electric buildings a pathway to code compliance, rather than locking in gas infrastructure for three more years waiting for the next code cycle. Given the dire warnings about the pace of climate change and the need for sharp reductions in GHGs by 2030, we have a limited window to act - and waiting until 2022 is far too long.