

**DOCKETED**

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California Energy Commission  
1516 Ninth Street, MS-37  
Sacramento, CA 95814-5512  
Sent via email to: [publicadvisor@energy.ca.gov](mailto:publicadvisor@energy.ca.gov)  
Docket: 19-BSTD-03

Dear Commissioners,

The California Community Choice Association (CalCCA) strongly supports the California Energy Commission's efforts to advance all-electric buildings and electric vehicle (EV) charging infrastructure in the forthcoming 2022 building code update.

CalCCA represents 20 Community Choice Aggregators (CCAs) which serve more than 10 million customers in 170+ cities and counties throughout California, as well as several aggregators that are planning to initiate service later this year or in 2021. CalCCA's members are committed to reducing greenhouse gas emissions and, as local government agencies, are well positioned to work with the state to achieve long-term decarbonization goals.

Several CCAs are already providing technical support to their member cities and counties as they pursue all-electric or electric-preferred reach codes for their member communities. To date, approximately 30 CCA member jurisdictions, representing a mix of climate zones, have adopted reach codes that promote electric buildings, and many others are considering adoption<sup>1</sup>. This groundswell not only shows that California is ready for requirements that support all-electric buildings and EV charging infrastructure, it also demonstrates that these codes can be implemented cost effectively across the state.

Commission studies have recognized that meeting our carbon reduction and air quality goals cost effectively will require rapid electrification of both buildings and transportation. Strengthening California's building codes will help the state achieve rapid decarbonization, reduce costs for mitigating criteria air pollutants and greenhouse gas emissions, save money by reducing additional natural gas infrastructure needs, and improve the health and wellbeing of building occupants.

As such, we support the Commission formally moving all-electric buildings to the base Title 24 compliance case for new building construction in California and requiring the installation of EV charging infrastructure on new construction. CalCCA looks forward to continuing to partner with the Commission to reduce greenhouse gas emissions and improve air quality in California.

Thank you for your consideration,

Beth Vaughan  
Executive Director

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<sup>1</sup> <https://www.sierraclub.org/articles/2020/07/californias-cities-lead-way-gas-free-future>