

**DOCKETED**

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*Comment Received From: Bay Area Air Quality Management District (BAAQMD)*  
*Submitted On: 7/30/2020*  
*Docket Number: 19-BSTD-03*

**BAAQMD Comments - 2022 Energy Code**

*Additional submitted attachment is included below.*



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Jack P. Broadbent  
**EXECUTIVE OFFICER/APCO**

July 29, 2020

California Energy Commission  
Docket Office, MS-4  
Re: Docket No. 19-BSTD-03  
1516 Ninth Street  
Sacramento, CA 95814  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)

**RE: All-Electric Buildings for the 2022 Building Energy Efficiency Standards Update**

Dear Commissioners:

The Bay Area Air Quality Management District (Air District) is writing to express support for an all-electric code for the California Energy Commission's (CEC) 2022 Building Energy Efficiency Standards.

The Air District, the air pollution control agency for the nine counties of the Bay Area, is committed to advancing regional and state greenhouse gas (GHG) reduction goals. In 2017, we published *Spare the Air, Cool the Climate*, a regional clean air plan that serves as a blueprint for moving the Bay Area toward a post-carbon economy and eliminated health risk disparities.

In order to meet the state's climate targets of 40% GHG emission reductions (from 1990 levels) by 2030, and carbon neutrality by 2045, the CEC must take bold action to decarbonize the building sector. A critical step toward achieving building decarbonization is to set an all-electric standard for new construction. The Air District fully supports equitable electrification across the state and acknowledges that the removal of natural gas combustion makes buildings safer and healthier for people, and more protective of the climate. An all-electric requirement for new construction would enable local and regional governments to focus on the larger challenge of electrifying the existing building stock. In the past year, more than 30 local governments in California, many from the Bay Area, have adopted local building policies limiting or outright banning the use of natural gas in new development, demonstrating a readiness for similar statewide policy.

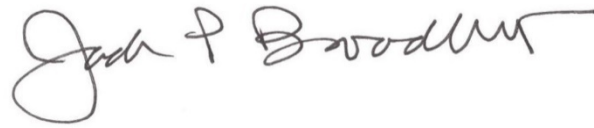
An all-electric 2022 code would also improve air quality and health outcomes for the residents of California. In addition to carbon dioxide and methane, leakage and combustion of natural gas in buildings releases toxic air contaminants, nitrogen oxides, carbon monoxide and particulate matter, creating indoor and outdoor pollution that significantly harms air quality and public health.

Connect with the  
Bay Area Air District:



The Air District enthusiastically encourages the CEC's development of an all-electric 2022 building code and looks forward to collaborations in our shared pursuit of a healthy, equitable and carbon-free California. For further information on the Air District's Building Decarbonization Program, please contact Environmental Planner Axum Teferra, at [ateferra@baaqmd.gov](mailto:ateferra@baaqmd.gov).

Sincerely,

A handwritten signature in black ink that reads "Jack P. Broadbent". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

Jack P. Broadbent  
Executive Director/APCO

Cc: Board of Directors, BAAQMD