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Comment Received From: Cecilia Taylor
Submitted On: 8/12/2020
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Comments from the City of Menlo Park

Additional submitted attachment is included below.



August 12, 2020

GM 20-139
California Energy Commission
Docket Unit, MS-4
1516 Ninth Street Sacramento, CA 95814-5512

RE: Docket No. 19-BSTD-03

Dear Commissioners:

As an early adopter of electrification Reach Codes, the City of Menlo Park strongly supports the California Energy Commission (CEC) adopting all-electric as the baseline for the 2022 Energy Code for new residential and commercial buildings to reach climate preservation targets with fewer stranded assets.

This next logical step in decarbonizing our state makes sense for California for environmental, economic, and public health reasons. Electrification of most energy end uses, including buildings, is the only practical way for California to achieve its landmark 2030 and 2045 climate change goals.

We strongly support the state's decarbonization efforts and we look for ways to innovate and illuminate the path forward. Our city's 2020 Climate Action Plan recognizes the importance of building and transportation electrification in realizing our net zero carbon emission goal by 2030. Menlo Park is partnering with other entities to promote electrification of new and existing buildings.

Encouraging all-electric development makes good sense from an economic policy perspective as well, since we can now see that natural gas assets are already environmentally obsolete and will soon become recognized as economically stranded assets. It is less expensive to build all-electric, low-rise residential homes, which lowers the cost to developers and prospective homeowners.¹

In Menlo Park and much of California, all-electric new buildings are also cheaper for homeowners to operate especially when they take advantage of affordable rooftop solar expansion above code minimum requirements. Therefore, gas-heated buildings leave Californians vulnerable to higher energy bills and steeper housing prices when many residents are reeling from the economic impacts of the COVID-19 crisis. Further, it will ultimately cost the state even more to retrofit gas-heated buildings in

the long-term.² It is clearly not in the best interest of Californians to install the natural gas pipes to and within new buildings when that gas infrastructure will need to be decommissioned within 25-years to meet the state's climate goals.


Electrification of new homes and buildings is also important from a public health perspective. An April 2020 UCLA study found that gas-fueled furnaces, water heaters, and stoves compromised indoor air quality to a degree that increases the likelihood of respiratory and cardiovascular disease.³

We appreciate the CEC's leadership in prioritizing decarbonization in the 2022 Energy Code. We look forward to working with the CEC to continue to advance efficient, all-electric construction as a necessary step in achieving the state's policy goals.

If flexibility is needed in implementing the All-Electric Base Code, perhaps it can be offered by allowing communities a process for pursuing "Lag Codes" where those communities who don't feel ready for electrification have the opportunity to develop and propose mixed fuel local Lag Codes if they can show that those Lag Codes save energy and are cost effective compared to the All Electric Base Code.

We hope the CEC proposes an All Electric Base Code for 2022 so we can simply adopt it and use our freed up time and attention to push for more climate preserving actions in areas beyond new construction.

Thank you for considering these views and recommendations.

Sincerely,
DocuSigned by:

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Cecilia Taylor
Mayor

1 Rocky Mountain Institute. <https://rmi.org/insight/the-economics-of-electrifying-buildings/>; <https://www.greenbiz.com/article/yes-clean-electric-buildings-can-reduce-emissions-and-save-moneynewconstruction>

2 E3 "Future of Natural Gas": <https://www.ethree.com/at-cec-e3-highlights-need-for-gas-transitionstrategyin-california/>

3 Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California. UCLA Fielding School of Public Health, Department of Environmental Health Services. (2020)