

**DOCKETED**

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# CITY OF MOUNTAIN VIEW

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On behalf of the City of Mountain View, I thank you for the opportunity to comment on the California Energy Commission's (CEC's) 2022 Building Energy Efficiency Standards. **We encourage the CEC to transition to a 2022 building code that is aligned with the State's climate targets by adopting an all-electric building code for both residential and commercial construction to utilize the State's increasingly carbon-free electricity resources.**

Like many California jurisdictions, the City of Mountain View has adopted aggressive greenhouse gas (GHG) emission reduction targets in line with those set by the State, including an 80 percent reduction by 2050 and carbon neutrality by 2045. In support of California's climate goals, the State has set in motion a number of policy initiatives focused on decarbonizing the electricity and transportation sectors. As California's electricity supply becomes increasingly carbon-free, natural gas is responsible for a larger percentage of emissions from building energy use. The combustion of natural gas in residential and commercial buildings comprises a large percentage of communitywide emissions in many California jurisdictions, including 17 percent of total GHG emissions in Mountain View.

With one-third of California's 2045 building stock being built in the next 25 years, building industry stakeholders need a clear signal from the State to move toward all-electric construction. Mountain View recognizes that continued expansion of natural gas infrastructure moves us farther away from our climate goals and will create the need for costly future retrofits. Therefore, the Mountain View City Council took action in November 2019 to exceed a proposed regional model code to incentivize all-electric buildings, and the City Council adopted reach codes requiring new construction to be all-electric. Thanks to the leadership of the City Council and the carbon-free electricity supplied by Silicon Valley Clean Energy, new buildings in Mountain View will no longer contribute to the City's GHG emissions. We encourage the CEC to take a similar step to support building decarbonization Statewide.

Decarbonizing the building sector also provides other benefits for Californians, particularly cost savings and improved indoor air quality. New all-electric homes are cheaper to construct than mixed-fuel homes and shield ratepayers from the volatile and rising price of natural gas. All-electric homes also offer health benefits due to eliminating the air pollutants emitted by gas appliances. These pollutants have been linked to various acute and chronic health effects, including respiratory illness, cardiovascular disease, and premature death.

Mountain View is proud to be one of 31 communities in California that have already adopted reach codes and local ordinances that prioritize or require all-electric new construction, piloting effective policies that act as a road map for other California jurisdictions and regulatory leaders like the CEC. If the State enacted similar codes, it would make it easier for builders to navigate each city's building code.

The City of Mountain View is committed to addressing climate change by reducing GHG emissions, making housing more affordable, and protecting the health of our residents. Newly constructed buildings will be in use for decades, and continuing to connect new buildings to natural gas will make it harder and costlier to convert them to clean electricity later. Therefore, we encourage the CEC to follow the lead of Mountain View and several other California cities and adopt an all-electric building code in 2022.



MARGARET ABE-KOGA, MAYOR

*Thank you.*

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