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*Comment Received From: Melicia Charles
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SVCE Written Comments on 2022 Energy Code Pre-Rulemaking

Additional submitted attachment is included below.



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October 5, 2020

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

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

Dear Commissioners:

Silicon Valley Clean Energy (SVCE) strongly supports the California Energy Commission (CEC) adopting an all-electric baseline for the 2022 Energy Code for residential and commercial buildings. 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.

SVCE strongly supports the state's decarbonization efforts and recognizes the importance of building and transportation electrification in helping the state and our communities achieve climate goals. SVCE dedicates over \$5M a year for decarbonization and resilience programs. Our cornerstone program for decarbonizing buildings is our reach code initiative to partner with our member agencies in the development and adoption of local amendments to the building code to accelerate all-electric buildings and higher deployments of electric vehicle charging infrastructure. In the current building code cycle, 10 out of 13 SVCE member agencies adopted reach codes, and 2 member agencies are currently in the evaluation process.

Our communities recognize that natural gas assets are already environmentally obsolete and will soon become recognized as economically stranded assets. 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. SVCE 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.

The CEC must take immediate additional steps to decarbonize the building sector. A critical step toward achieving building decarbonization is to set an all-electric



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standard for new construction. We strongly urge the CEC to transition towards a building code that is aligned with the state's climate targets by stopping the expansion of gas infrastructure and adopting an all-electric building code for both residential and commercial buildings to utilize the state's increasingly carbon-free electricity resources in 2022. An all-electric requirement for new construction in the 2022 building code cycle would enable our local governments to focus on the larger challenge of electrifying the existing building stock.

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 addressing the climate crisis.

Sincerely,

A handwritten signature in blue ink that reads "Girish Balachandran".

Girish Balachandran, CEO