

DOCKETED

Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	235042
Document Title:	Architecture 2030 Comments - CEC Letter
Description:	N/A
Filer:	System
Organization:	Architecture 2030
Submitter Role:	Public
Submission Date:	10/5/2020 4:31:57 PM
Docketed Date:	10/5/2020

Comment Received From: Architecture 2030
Submitted On: 10/5/2020
Docket Number: 19-BSTD-03

CEC Letter

CEC Letter Attached.

Additional submitted attachment is included below.



October 5, 2020

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

Re: Docket No. 19-BSTD-03

We are heading into an extremely dangerous period. If we do not take action now, the planet will overshoot 1.5°C warming by a wide margin with consequences that are projected to be devastating to California, our country, and the entire world.

The world is projected to build a breathtaking 260 billion m² over the next four decades, *or an area equal to the current world building stock*. About 40% of this construction is expected to take place between now and 2030. That is more than the total number of buildings currently in North America, South America, the Caribbean, the entire EU, and Australia and New Zealand *combined*, all adding to the emissions problem.

Most of this new construction will take place in China, India, Southeast Asia, Latin America, and Africa, where there are either no mandatory building energy codes, or inadequate building energy codes at best. If these buildings are designed and built to current standards, *it will dwarf all other emissions reduction actions*.

Unfortunately, there is a dearth of political leadership on this issue at the national level, yet California has always been the first to take action addressing climate change. However, California's commercial building sector is not expected to reach zero-net-energy until 2030, too late to influence the development of commercial construction in California and building energy codes worldwide.

California is positioned to take the global leadership role in reducing carbon emissions in the building sector by accelerating the timeline and reaching *zero-carbon* in *all* new construction by 2022. This would send an urgent and powerful worldwide call-to-action.

The work needed to reach zero-carbon has already been completed. The recently published 2022 ZERO Code for California was developed in collaboration with AIA California. It builds upon the upcoming 2022 California Building Energy Standards (BEES), referring the 2022 California BEES's pending Hourly Source Energy metric, prohibits gas equipment in the building, a minimum amount of on-site PV, and adds a renewable energy requirement that recognizes specific off-site renewable energy procurement. The 2022 ZERO Code for California does not modify the energy efficiency standard, making it compatible with future advancements of Title 24 and should be adopted now.

The world looks to – and expects – California to lead the way.

Sincerely,

Edward Mazria
CEO, Architecture 2030