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*Comment Received From: 350 Sacramento
Submitted On: 10/20/2020
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**Establish Strong Decarbonization Requirements in the Proposed
2022 Energy Code on Electrification Update**

Additional submitted attachment is included below.



October 20, 2020

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

Re: Staff Workshop: 2022 Energy Code Pre-Rulemaking – Proposed 2022 Energy Code on Electrification

Dear Commissioners:

350 Sacramento thanks the California Energy Commission (CEC) for this opportunity to comment on the 2022 Building Energy Efficiency Standards on Electrification.

350 Sacramento is dedicated to local climate action that will lead to long term reduction in greenhouse gas emissions. We served on the recently concluded Sacramento Mayors' Commission on Climate Change where we recommended all-electric new building construction. Currently we are working with the Sacramento City Council, which is on the cusp of adopting an all-electric ordinance for low-rise residential construction by next year. The City will be following up with a timeline for extending the all-electric requirements for other building types in the future. In this regard, Sacramento will be joining 36 other municipalities who have adopted Reach Codes for building electrification.

But these efforts, while laudable, are altogether too piecemeal for the larger greenhouse gas reduction challenge facing our state. We strongly believe that local efforts should be supported by a strong Title 24 code that goes beyond compliance incentives for heat pumps and all-electric buildings. The new code should unequivocally commit to the timely transformation of all buildings away from natural gas. In the current code cycle, this means stricter requirements for the gas baseline in favor of electric appliances and away from new gas infrastructure.

Time really is running out as the ravages of climate change, once thought to be in the future, become our current reality. This new code will impact new construction from 2024 until 2026. We cannot afford to have even that 3-year delay allow installation of gas equipment in new buildings that will be sowing further climate impacts for the next 15–20 years. We urge the CEC to establish strong decarbonization requirements in this code update.

Sincerely,

A handwritten signature in black ink that reads 'Laurie Litman'.

Laurie Litman
350 Sacramento