

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	235353
Document Title:	Alice Sung, Greenbank Associates Comments - Support for all-electric code for Public PreK-14 Schools
Description:	N/A
Filer:	System
Organization:	Alice Sung, Greenbank Associates
Submitter Role:	Public
Submission Date:	10/20/2020 3:02:46 PM
Docketed Date:	10/20/2020

Comment Received From: Alice Sung, Greenbank Associates
Submitted On: 10/20/2020
Docket Number: 19-BSTD-03

Support for all-electric code for Public PreK-14 Schools

See attached document

Additional submitted attachment is included below.

October 19, 2020

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

Re: Staff Workshop: 2022 Energy Code Pre-Rulemaking – Proposed 2022 Energy Code on Electrification; Re: Docket No. 19-BSTD-03 ; docket@energy.ca.gov

Dear Commissioners,

Speaking on behalf of the 10,000+ public pre-K-12 schools in our state, I thank you for the opportunity to comment on the California Energy Commission's (CEC) proposed 2022 Building Energy Efficiency Standards (Energy Code) on Electrification. This is to follow up on my public testimony presented at the end of your last Business meeting, Agenda Item 9 on Reach Code approvals, regarding support for an all-electric baseline for all building sectors in the 2022 Building Code, T24. If all commercial sector types cannot be included along with Residential buildings, then I urge you to include at least all public sector buildings, with a special emphasis on public pre-K-14 school buildings, including all pre-school, K-12, as well as community college buildings, and higher education.

As infants and youth are more susceptible to the impacts of both indoor and outdoor air pollution compounded by exposures to gas combustion within buildings where they live, learn, play and will actively work in, to say nothing of methane leakages, it is critical that they not be left behind in your consideration. This should also include all in-home and stand alone day care centers, early childhood education centers, and child care facilities on campuses.

Since these public education facilities are NOT under the local (i.e. municipal Reach Codes) jurisdiction having authority, but rather the State DSA/ State Building Codes themselves, it is imperative that the CEC not wait until the 2025 code, which would not even begin to take effect until 2026 (!), to decarbonize this sector to protect the public health, safety, and welfare of our children; especially the over 50% of our public school population that are Title 1 eligible for free and reduced price lunches in low income and disadvantaged frontline communities most impacted by climate change and pollution.

It is also urgent to capture the opportunities of a 2022 all-electric code for both new construction AND retrofitting of existing school buildings in the public PreK-14 schools sector to prepare for and to leverage immediate and future funding programs such as in AB 841 (Ting) to decarbonize, add EV infrastructure, solar and battery storage with SMART inverters/controls technologies for our public schools. This would not only save operating dollars that could be shifted into educational program, it would avoid stranded gas assets, more wisely invest public dollars, and provide all the benefits of a zero carbon school district system, statewide. Thank you for your consideration.

Sincerely,

Alice Sung, AIA, LEED AP, BD+C, ISSP-SA

Principal, Greenbank Associates