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### **The Campaign for Fossil Free Buildings in Silicon Valley**

350 Silicon Valley, Acterra, Bay Area for Clean Environment, Carbon Free Silicon Valley, Carbon Free Palo Alto, Carbon Free Mountain View, Citizens' Climate Lobby San Mateo County, Citizens Environmental Council of Burlingame, Clean Coalition, Climate Reality: Santa Clara County, Coltura, Cool Block, Earthy B, emeraldECO, Fossil Free Mid-Peninsula, GreenTown Los Altos, Kitchens of Life, Menlo Spark, Menlo Together, Mothers Out Front Silicon Valley, Pacifica Climate Committee, Peninsula Interfaith Climate Action, Project Green Home, Redwood Energy, SIDCO Homes, San Carlos Green, San Francisco Bay Physicians for Social Responsibility, Sierra Club Loma Prieta Chapter, Sustainable San Mateo County, Sustainable Silicon Valley, Sunnyvale Cool, Silicon Valley Youth Climate Action, and Silicon Valley Youth Climate Strike.

October 20, 2020

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

Submitted via: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

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

Dear Commissioners,

On behalf of the Campaign for Fossil Free Buildings in Silicon Valley (FFBSV), this letter expresses our strong support for the California Energy Commission's (CEC) to eliminate the gas compliance pathway and require all-electric new construction in the proposed 2022 Building Energy Efficiency Standards (Energy Code). We appreciate the CEC's efforts to encourage the use of heat pumps, but strongly urge a more prudent policy that responds to the urgency of the climate crisis and aligns with our statewide goals to cut carbon and transition to renewable energy production.

[FFBSV](#) includes the 33 organizations listed above, working together to support an accelerated phase out of fossil fuels in buildings. A rapid transition away from fossil fuel use is critical to avoid the very worst and irreversible impacts of climate change. Preventing the use of fossil fuels, including natural gas, in new construction will create more affordable, cleaner, healthier, and more resilient housing and buildings for communities throughout California.

This year is set to be the hottest on record. California is experiencing extreme heat, unusual lightning activity, and unprecedented wildfires, which are all hallmarks of climate destabilization. The depth of the climate crisis is worse than commonly understood and demands urgent action. In addition to

sobering current conditions, our state faces devastating long-term climate consequences of significant flooding from sea level rise and inundation of entire communities and critical infrastructure. In 2018, the Intergovernmental Panel on Climate Change (IPCC) concluded that ***we must dramatically reduce Greenhouse Gas (GHG) emissions by 2030 through rapid, far-reaching, and unprecedented measures.***<sup>1</sup> Since that report was issued, we have seen greater impacts from climate change than anticipated.<sup>2</sup> Current trends for carbon emissions and lack of action show that we are headed to *twice* the rate of warming that the Paris Climate Accord sought to contain.

We must begin a necessary transition away from polluting fossil fuels, including natural gas. A CEC building code requiring all-electric construction won't just save energy, it will lead to more affordable, cleaner, healthier, and more resilient housing and buildings for communities throughout our state. At least 35 California cities and counties have already adopted electrification reach codes beyond the current state minimum requirements for energy use in building design and construction. These local governments are leading the way on clean air, climate solutions, and the renewable energy economy.

As California grapples with a climate crisis, the CEC must take the lead and set the building industry on a clear path towards all-electric construction. Newly constructed buildings will be in use for decades and thus, it is crucial to prevent new gas connections that will lead to stranded assets. We urge the CEC to set strong decarbonization requirements in this code update, requiring new homes and buildings to be all-electric. We thank you for this opportunity to comment.

Sincerely,

Diane Bailey

Executive Director, Menlo Spark, on behalf of FFBSV

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<sup>1</sup> <https://www.ipcc.ch/sr15/> Also see: WRI blog for a roundup of the landmark reports of 2018 & a comparison of climate impacts in a 1.5 deg.C v. 2 deg.C world: <https://www.wri.org/blog/2018/12/2018-year-climate-extremes>

<sup>2</sup> For example, the 2019-2020 Australian wildfire that destroyed over 10,000 buildings and killed at least 34 people, and a massive global bleaching event for coral reefs impacting hundreds of millions of low income people who rely on fisheries for their food or livelihoods.

See: A roundup on the latest global reports showing a worsened outlook than previously understood, including an estimated 3-5 degrees C of likely warming by the end of the century, [here](#):

[https://docs.google.com/document/d/1-LHZe9kFhLymXE7CaVZmgQTx8VEfbGKAVOSK\\_x4TcDo/edit?usp=sharing](https://docs.google.com/document/d/1-LHZe9kFhLymXE7CaVZmgQTx8VEfbGKAVOSK_x4TcDo/edit?usp=sharing)

[This WRI blog](#) discusses the state of international climate negotiations as of COP25 and what is required moving ahead:

<https://www.wri.org/blog/2019/12/cop25-what-we-needed-what-we-got-whats-next>

[This NYT OpEd](#) discusses why climate action is essential in the midst of the COVID-19 pandemic and how to integrate a climate response into the economic recovery required: <https://www.nytimes.com/2020/04/15/opinion/climate-change-covid-economy.html?smid=em-share>