

DOCKETED

Docket Number:	20-BUSMTG-02
Project Title:	Public Comment on California Energy Commission Business Meetings
TN #:	235894
Document Title:	Public Comment for Dec 9 2020 Bus Mtg Item 8 Comments - Public Comment for Dec 9 2020 Bus Mtg Item 8
Description:	Crown Pointe Estates comments on Item 8
Filer:	Rosemary Avalos
Organization:	California Energy Commission
Submitter Role:	Public Advisor
Submission Date:	12/9/2020 8:36:45 AM
Docketed Date:	12/9/2020

From: [Scott Morris](#)
To: [Energy - Public Advisor's Office](#)
Cc: [Energy - Docket Optical System](#)
Subject: Comment Submission for CEC Meeting December 9th
Date: Wednesday, December 9, 2020 7:26:39 AM
Attachments: [Title 24 Comments 12_06_20.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners,

On behalf of Crown Pointe Estates, a residential developer, we would like to express our support for the passage of all the electric reach codes presented today.

Furthermore, the CEC should move towards adopting a single, all-electric baseline for single family residential buildings because all-electric homes are cheaper to operate, better for public health, and critical to protect us from the climate crisis.

We are finishing construction on an all electric home that includes the next generation of building equipment, such as heat humps, including pool heat pumps, and CO2 water heaters, and can say from first hand knowledge, the cost to build an all electric home is near the cost to build a combustion home.

Best regards,
Scott Morris

*DOCKET SUBMISSION ATTACHED

--

Scott Morris


December 9, 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:

On behalf of Crown Pointes Estates at Malibu, a residential developer, we thank you for the opportunity to comment on the California Energy Commission's (CEC) proposed 2022 Building Energy Efficiency Standards (Energy Code) on Electrification. We appreciate the CEC's efforts to encourage the use of heat pumps, and we support the proposal's use of compliance incentives for all-electric buildings. However, the proposal is insufficient to shift the market to electric new construction. **We urge staff to set strong decarbonization requirements by tightening the gas baseline, in order to lead to broad adoption of all-electric new construction.**

In early 2019, the Building Decarbonization Coalition published a roadmap laying out the key activities required to efficiently, equitably, and affordably electrify the building sector.¹ The roadmap emphasizes that any new building construction between now and 2045 that relies on fossil fuels for space and water heating represents incremental emissions, deepening the challenge of decarbonizing the sector.

The code the Energy Commission adopts this year will apply to buildings constructed between 2024 and 2026. We cannot wait another three years to update the Energy Code and allow building with gas until 2029. According to Rocky Mountain Institute (RMI), delaying the code update until the next cycle would result in an additional three million tons of carbon emissions by 2030 – the equivalent of putting 650,000 more cars on the road for a year.²

40 California cities and counties have already adopted electrification reach codes beyond the state minimum requirements for energy use in building design and

¹ [A Roadmap to Decarbonize California's Buildings](#). Building Decarbonization Coalition (2019).

² [California Can't Wait on All-Electric New Building Code](#). Rocky Mountain Institute (2020).

construction, with these local governments now 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 (i.e. manufacturers, architects, real estate agents, builders and contractors) on a clear path towards all-electric construction.

For California to meet its housing, health, and climate goals, homes and buildings must use clean energy. Newly constructed buildings will be in use for decades and continuing to connect new buildings to gas makes it much harder and costlier to convert them to clean electricity later. Therefore, we urge the CEC to set strong decarbonization requirements in this code update. We look forward to collaborating with the CEC and other interested stakeholders ahead of the next workshop.

Sincerely,
Scott Morris

Scott Morris