

**DOCKETED**

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**From:** [Shelah Ott](#)  
**To:** [Energy - Public Advisor's Office](#)  
**Subject:** Public Comment - CEC T24 Proposal  
**Date:** Wednesday, December 9, 2020 9:45:35 AM

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Hi,

I'd like to submit public comment for the CEC's 12/9 meeting on the T24 update. Please see below:

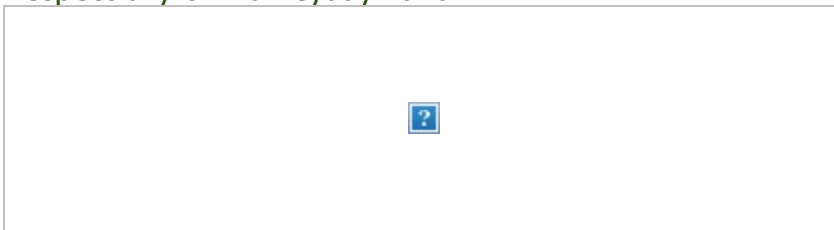
Hi, my name is Shelah Ott and I'm a southern California resident living in San Diego. I would like to express the urgent need for the CEC to move towards adopting a single, all-electric baseline for all building types. All-electric buildings are cheaper to build and operate, better for public health, and critical to protect us from the climate crisis. In relationship to this Reach Code item 8, allowing for an all-electric heat pump baseline for commercial/non-residential buildings is especially important for public preK-14 schools and local community college facilities, which are NOT under the jurisdiction of municipal ordinances or Reach Codes, but must comply with the CA State Building Codes and Standards, including T24. The current CEC T24 proposal to set heat pump baseline for "small schools" may seem to go in the right direction. But, to be equitable, an all-electric baseline needs to be extended to ALL public schools, colleges, and universities. Continuing to allow for a gas/dual-fueled baseline for "medium and large schools" would penalize electrification and hinder the ability to leverage AB 841 and future funds to decarbonize schools to meet state climate goals, and to improve both indoor and outdoor air quality for California children and school communities already hardest hit by the pandemic. This is especially important for Californian communities of concern, who are already experiencing disproportionate impacts of pollution from natural gas and climate change as a whole. I urge you to please integrate equity into the T24 update so that our most vulnerable and disadvantaged communities are uplifted and protected.

Thanks,

**Shelah Ott** (she/her/hers)  
Climate Justice Advocate

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