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3C-REN Comments on Title 24 Update

Additional submitted attachment is included below.



December 24, 2020

California Energy Commission Docket Office, MS – 4

Re: Docket No. 19-BSTD-03 1516

Ninth Street Sacramento, CA 95814

docket@energy.ca.gov

Dear Commissioners and Staff,

The Tri-County Regional Energy Network (3C-REN) is pleased to submit these comments and recommendations as part of the pre-rulemaking process for the 2022 Building Energy Efficiency Standards. The 3C-REN is a collaboration of three counties, Ventura, Santa Barbara, and San Luis Obispo, in the California Central Coast Region, with a diverse service area that is geographically isolated from utility hubs, has pockets of rural and disadvantaged communities, and large, underserved Spanish-speaking populations. After several years' experience and cooperative administration of energy and sustainability programs, the three counties formed the 3C-REN, led by the County of Ventura, to better leverage resources in the delivery of effective programs on a regional level. One of those programs is Energy Code Connect which provides building professionals with forums, trainings, and support services focused on increasing comprehension, compliance, and enforcement of California's energy code.

With the needs of the local building industry in mind, 3C-REN supports staff proposals to establish an all-electric compliance pathway for commercial and residential sectors, require PV and battery storage for many building types, and restructure the multifamily energy standards. 3C-REN looks forward to informing the tri-county region of these and other potential changes once the energy code is adopted.



3C-REN supports the establishment of an all-electric building code for commercial and residential sectors

California Governor Gavin Newsom said it best at a recent wildfire press briefing, “While it’s nice to have goals to get to 100% clean energy by 2045, that’s inadequate to meet the challenges the state, and I argue this nation, faces.” 3C-REN applauds the Energy Commission for proposing all-electric alternative baselines for all building types as means to electrify and accelerate California’s climate goals. Should the Energy Commission move forward with additional all-electric compliance pathways, 3C-REN recommends providing robust compliance incentives for building professionals who make the move to all-electric construction. An “electrification” compliance credit is one more leverage point the Energy Commission can provide to encourage the industry to incorporate heat pump water heaters and other electric measures into their projects.

3C-REN agrees with comments from Mayor Cathy Murillo with the City of Santa Barbara, located in the tri-county region, which express that all-electric homes offer additional health benefits due to the elimination of air pollutants emitted by gas appliances such as carbon monoxide (CO), nitrogen oxides (NOx) including nitrogen dioxide (NO₂), particulate matter (PM), and formaldehyde, which have been linked to various acute and chronic health effects, including respiratory illness, cardiovascular disease, and premature death.¹ Furthermore, gas appliances pose a greater risk on low-income communities as these air pollutants are most acute for apartments due to a smaller residence size.

Lastly, 3C-REN suggests that the Energy Commission considers requiring buildings built with gas appliances/equipment to be electrification-ready. This would require all installed natural gas appliances and equipment to incorporate an appropriately sized electrical circuit and dedicated slot(s) in the electrical panel to power a direct electric replacement of the gas equipment. Equipment and appliance types would include space heating, domestic hot water, cooking, clothes drying, fireplaces, and others typically installed with natural gas for all residential new construction and nonresidential new construction where applicable.

¹ Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California. UCLA Fielding School of Public Health (2020).



3C-REN supports requiring PV and battery storage for many building types

3C-REN supports the CEC's proposal to require PV and battery storage for the proposed building types. This measure will result in emissions reductions, add to grid flexibility, and be cost-effective for consumers.

3C-REN supports the restructuring of multifamily energy standards

A common complaint from the local building industry about the energy code is that it's too complex and difficult to enforce. While 3C-REN offers resources and personalized support that address this need, a more effective solution would be to simplify the energy code. 3C-REN supports the staff proposal of restructuring of the multifamily energy code by construction and mechanical equipment instead of the number of habitable stories. We believe this will help improve understanding, interpretation, and access to multifamily energy code requirements; thereby resulting in greater compliance.

We appreciate the opportunity to provide comment and thank the CEC for carefully considering 3C-REN's response to the request for comments.

Sincerely,

Jordan Garbayo
Energy Program Manager, Tri-County Regional Energy Network

A handwritten signature in blue ink, appearing to read "Jordan Garbayo".