

DOCKETED

Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	236716
Document Title:	350 Bay Area Comments - Need for All-Electric 2022 Building Code - Comments on Jan 26 workshop
Description:	N/A
Filer:	System
Organization:	350 Bay Area
Submitter Role:	Public
Submission Date:	2/9/2021 3:48:28 PM
Docketed Date:	2/9/2021

*Comment Received From: 350 Bay Area
Submitted On: 2/9/2021
Docket Number: 19-BSTD-03*

Need for All-Electric 2022 Building Code - Comments on Jan 26 workshop

Additional submitted attachment is included below.



350 Contra Costa
350 East Bay
350 San Francisco
350 Marin
350 Sonoma
Napa Climate NOW!

February 9, 2020

California Energy Commission
Dockets Office, MS-4 19-BSTD-03
1516 Ninth Street
Sacramento, CA 95814-5512

**RE:1/26/21 Workshop Comments | 2022 Energy Code Pre-Rulemaking
-19-BSTD-03**

It is hard for us to understand how the CA Energy Commission can propose waiting a few more years to move to an all-electric baseline for buildings of all types when it is so critical for the state's climate goals and for its residents' public health. And it is so much less expensive to build this way. At last count, 38 local government entities in the SF Bay Area have already passed much stronger limits on natural gas in new buildings or gone all-electric, with more considering these limits right now. They are seeing the various benefits clearly and have moved quickly, but this has created many different requirements for builders to deal with from each area to the next, often close by. It would be so much better for the Commission to take the lead and establish a statewide directive that shows California understands all the cost benefits and recognizes the pace of the climate emergency. Is the Commission really paying attention to current climate science?

Delaying large-scale electrification until the 2025 code update would allow new buildings to be built with gas equipment and plumbing, and new gas infrastructure to be deployed for those buildings, until 2029, because of the lag between permitting and end of construction, particularly on large projects. It won't be long before there will be a desperate desire to retrofit with all-electric. While we appreciate that you may require that new buildings be all-electric ready, which will help defray some of those costs, having to bring the gas infrastructure to new buildings in order to have either a heat pump water heater or a heat pump space heater, but not both, is really inefficient. Waiting three more years for an all-electric code would cost Californians \$1 Billion in unnecessary gas infrastructure, and lock us into 3 million tons of additional carbon emissions by 2030.¹

There are so many costs not being looked at as much as they should be. Health costs can be quite substantial for people living in homes using gas. And it is not socially

¹ "California Can't Wait on All-Electric New Building Code". Grab, D., Shah, A. RMI Energy Innovations. July 28, 2020 <https://rmi.org/california-cant-wait-on-all-electric-new-building-code/>

equitable in the way these costs are distributed across our population. Research shows that children with asthma are particularly affected by indoor air pollution from gas stoves. Children living in areas with high levels of outdoor air pollution, often lower-income, African American and Hispanic children with asthma, are likely the most disproportionately burdened by indoor air pollution from gas stoves. A meta-analysis looking at the association between gas stoves and childhood asthma found children in homes with gas stoves have a 42% increased risk of experiencing asthma symptoms (current asthma), a 24% increased risk of ever being diagnosed with asthma by a doctor (lifetime asthma), and an overall 32% increased risk of both current and lifetime asthma.²

You have found in so much of the work you have done to establish this new baseline that costs of building all-electric for all categories are very close to those using methane (natural) gas and mixed fuel or, most often, considerably less. When you add in the social costs and the costs to California's climate goals, even as they are now, not updated with the current science that tells us how much we must get done by 2030, it should be easy to see that you must choose an all-electric baseline for 2022.

Sincerely,



Ken Jones
Clean Energy Campaign Lead

² Weiwei Lin, Bert Brunekreef, and Ulrike Gehring, "Meta-analysis of the effects of indoor nitrogen dioxide and gas cooking on asthma and wheeze in children," *International Journal of Epidemiology*, Volume 42, Issue 6, (December 2013): 1724–1737, <https://doi.org/10.1093/ije/dyt150>.