

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	236729
Document Title:	SanDiego350 Comment - Support for All-Electric 2022 Building Code Standards
Description:	N/A
Filer:	System
Organization:	SanDiego350
Submitter Role:	Public
Submission Date:	2/10/2021 2:11:12 PM
Docketed Date:	2/10/2021

Comment Received From: Oliver Tiliouine
Submitted On: 2/10/2021
Docket Number: 19-BSTD-03

SanDiego350 - Support for All-Electric 2022 Building Code Standards

Additional submitted attachment is included below.



February 9, 2021

Chair David Hochschild and J. Andrew McAllister
Commissioners
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Sent by e-delivery

Ref: Docket No. 19-BSTD-03

Dear Mr. Hochschild, Dr. McAllister, and fellow Commissioners:

Please accept this submission in response to the staff proposal for 2022 Building Code Standards (Docket No. 19-BSTD-03).

SanDiego350 is an inclusive volunteer organization building a movement to prevent the worst impacts of climate change and climate injustice. We strive to create a future that supports a livable planet and a just society. SanDiego350 achieves its goals through education and outreach, public policy advocacy, and mobilizing people to take action.

Our concerns surround the suggestion of only requiring a single electric system, in place of an all-electric approach for new residential construction. The current proposal requires either a Heat Pump Space Heater (HPSH) or a Heat Pump Water Heater (HPWH) depending on the climate region in which the construction is occurring. This is ultimately a half-hearted and inadequate effort, particularly considering the development of all-electric ordinances by over 40 Californian jurisdictions. Waiting until 2025 to require all-electric appliances does not reflect the urgency of our climate emergency, nor encourage the kind of action required to mitigate climate change impacts that endanger our future. We do not have time to waste.

As the federal government now attempts to recognize and take climate action seriously, it is time for the Commission to build off this momentum and adopt building codes that end the reliance of buildings on carbon-based fuels. These fuels further increase damaging greenhouse gas emissions and pollutants that lower air quality to levels causing further public health problems for communities of concern. We ask the Commission to reconsider its recommendations and adopt requirements for both HPSHs and HPWHs for the entire State in the 2022 Building Code Standards.

Thank you for your consideration,

Oliver Tiliouine, Member and Marie Chen, Co-chair
SanDiego350 Public Policy Team