

<b>DOCKETED</b>	
<b>Docket Number:</b>	19-BSTD-03
<b>Project Title:</b>	2022 Energy Code Pre-Rulemaking
<b>TN #:</b>	237028
<b>Document Title:</b>	Coalition for strong building decarbonization standards pre-rulemaking comments
<b>Description:</b>	This document is a comment letter submitted by a coalition of stakeholders advocating for rapid building decarbonization.
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<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	3/8/2021 9:35:11 AM
<b>Docketed Date:</b>	3/8/2021



**To:** Alice Reynolds, Advisor to Governor Newsom  
Jared Blumenfeld, Secretary, California Environmental Protection Agency  
Wade Crowfoot, Secretary, California Natural Resources Agency  
Liane Randolph, Chair, California Air Resources Board  
David Hochschild, Chairman, California Energy Commission  
Andrew McAllister, Commissioner, California Energy Commission  
Gustavo Velasquez, Director, Department of Housing and Community Development  
Tia Boatman Patterson, Executive Director, California Housing Finance Authority

**From:** Coalition for strong building decarbonization standards

**Date:** March 5, 2021

**Re:** 2022 Building Energy Efficiency Standards (Title 24, Part 6)

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Greetings,

To help in the administration's deliberations on building decarbonization, our coalition of California businesses, environmental NGOs, architects, and engineers has prepared the following comments on the California Energy Commission's (CEC) 2022 Building Energy Efficiency Standards (Building Code) pre-rulemaking draft published on February 22, 2021. We thank the CEC for their hard work on this draft and the adjustments made to advance the state's decarbonization goals. In support of continued progress towards affordable and equitable building decarbonization and clean air policies, we share the following comments:

**California must shift to all-electric new construction as quickly as possible to meet its climate goals and avoid future costs**

California's climate crisis and 2045 carbon neutrality goal require the state to plan for a carbon-free economy. To achieve this goal, California must stop using fossil fuels to heat buildings, starting with new construction. All-electric buildings will rely exclusively on clean energy as the grid gets cleaner and uses renewable energy sources. In addition to the climate and clean air benefits, all-electric construction is cheaper and faster to build than gas construction and is cost-effective for consumers, particularly as solar photovoltaic helps offset heating and hot water costs.<sup>1</sup> All-electric new construction also reduces costs down the line, as most mixed-fuel construction will need to be electrified in the future to meet the state's emission reduction goals. To minimize additional emissions from buildings and avoid retrofits in the future, the 2022 code

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<sup>1</sup> [Here's how California can cut affordable housing costs, CalMatters](#): The director of sustainable design for one of the nation's largest affordable housing developers highlights the construction time, cost, and utility bill saving benefits associated with building all-electric.

must set a strong standard that transitions the market to all-electric construction.

**We strongly support the CEC’s improved proposal to provide a meaningful yet flexible transition pathway toward all-electric construction, and urge CEC to continue to strengthen it**

We appreciate the improvements in the CEC’s proposal to more meaningfully incentivize all-electric construction. It is essential to move the market, and CEC’s proposal would do this in a flexible manner, leaving builders options to transition when they are ready, and offering some options that are lower cost than the current code. The draft’s updated space and water heating baselines go in the right direction but need to be expanded to key climate zones and system types to ensure they effectively drive the transition to all-electric construction statewide by 2025. We strongly support the current draft’s all-electric readiness measures to allow for easy electrification in the future and ensure mixed-fuel building owners are not saddled with higher retrofit costs later. Lastly, we applaud the draft’s differentiated ventilation requirements for gas and electric stoves. This is critical to account for the harmful impacts of gas stoves on indoor air quality and the associated adverse health effects. All three code updates are critical to encourage the transition away from fossil fuels in new buildings.

**The state needs to make a public commitment to an all-electric 2025 building code**

California has already committed to weaning its economy from fossil fuels by 2045, and the CEC must do its part to commit to decrease emissions in buildings. The technology necessary to make this transition already exists, but the market needs a clear signal to an all-electric future in order to ramp up production and meet the demand. Therefore, the CEC must publicly commit to an all-electric 2025 building code to overcome market inertia and set in motion the forces to address the climate crisis. Delaying the transition any longer would result in new buildings that would exist for many decades. The time is now for the state of California to align its building energy policies with its housing affordability, public health, and climate goals.

**The Building Standards Commission must adopt a voluntary all-electric code for the Green Building Standards Code (Title 24, Part 11) to minimize the burden on local governments leading the way on climate action**

42 California cities and counties have already adopted local “reach” codes that require or encourage clean electric new construction. When the CEC updates Title 24, part 6 of the building code on January 1, 2023, all of these cities and counties will need to readopt their reach codes. The diversity among these adopted reach codes can be challenging for manufacturers, builders, and other construction market players to navigate; a voluntary, all-electric code in the California Green Building Standards Code (Title 24, Part 11) would offer a consistent, replicable electric

new construction reach code to help market actors better plan for and anticipate the requirements of the construction market while simultaneously allowing local jurisdictions to quickly implement a standardized all-electric code in 2023. This voluntary code provides the transparency and consistency the manufacturing and construction industries need and empowers local jurisdictions to swiftly readopt their climate-leading reach codes.

We thank the CEC for their continued work in the building code development process and look forward to continued collaboration.

Sincerely,

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