

**DOCKETED**

<b>Docket Number:</b>	21-BSTD-01
<b>Project Title:</b>	2022 Energy Code Update Rulemaking
<b>TN #:</b>	237949
<b>Document Title:</b>	Mothers Out Front Comment on CEC 2022 Building and Energy Codes
<b>Description:</b>	N/A
<b>Filer:</b>	Chester Hong
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	5/24/2021 2:11:26 PM
<b>Docketed Date:</b>	5/24/2021

**From:** [Stephanie Morris](#)  
**To:** [Energy - Docket Optical System](#)  
**Subject:** Comment or CEC 2022 Building and Energy Codes  
**Date:** Monday, May 24, 2021 11:02:30 AM

---

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My name is Stephanie Morris. I am a mother and a volunteer with Mothers Out Front Silicon Valley. Our chapter represents over 2,000 people locally and 35,000 people nationally, all mobilizing for a livable future for all children because **we are out of time**. The climate crisis is happening now. **You have today one powerful change you can make to help us avoid the worst impacts of the climate crisis. I urge you to adopt an ALL-ELECTRIC requirement for all building types in the 2022 building code.**

As a landscape architect and mother, I know we cannot wait until the 2025 code update to phase out gas because this would lock us into **8 more years of NEW** gas appliances and infrastructure, until **2029**, due to the lag in completing construction after permitting for large projects. The result? **Millions of dollars in additional infrastructure costs and up to 3 million tons of additional emissions by 2030. This is incompatible with the science and with the climate reality we are now experiencing.**

The economics are clear. Multiple studies confirm building all-electric is **less expensive than building with gas** in both residential and commercial construction.

The science is clear. In California 95 percent of homes still use gas heating. We lag behind the rest of the country in converting to more efficient heat pump technology. We still allow new gas stoves to be installed, knowing they contribute to toxic indoor air quality. Fossil gas extraction and transport continues, releasing tons of **methane, a super potent greenhouse gas which heats the planet up way faster than carbon dioxide. We need building codes to set the standards, so that market conditions reflect our climate reality.**

According to RMI reports, cost-effective electrification is possible for residential new buildings even in the coldest climates. Contractors and technology will continue to adjust based on code requirements, and it is this process that will allow us to phase out gas infrastructure. We won't achieve the climate gains of electrification until we phase out the gas infrastructure. Establish an all electric code, with temporary exceptions only as needed for any current gaps in technology. **This is an emergency and we cannot take an incremental approach anymore.**

State Level agencies like the California Air Resources Board and Bay Area Air Quality

Management District have submitted letters and made oral statements that the CEC should move to all-electric buildings in 2022.

**The code as written now will result in a dire future for millions of children. Mothers Out Front is asking the CEC to step up now at this critical time. It is your responsibility to protect public health and climate stability. It makes no sense to continue to build new buildings with outdated and unhealthy gas infrastructure.**

**This past year, I've spent hours of volunteer time with my team working with multiple cities in Silicon Valley one by one to pass electric reach codes. Let's stop asking city councils and citizens to become experts on the intricacies of building electrification, creating an ineffective patchwork of partial building electrification. Please act with the urgency this moment requires, setting the standard for California and motivating other states to take action. The 2022 building code MUST require all-electric buildings.**

Thank you for your time and for this important meeting.

**Stephanie Morris**  
Mothers Out Front