

DOCKETED

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Letter of Support for All-Electric Building Code in 2022

Additional submitted attachment is included below.

Docketed in 21-BSTD-01
6/17/2021

**Re: Comments on Rulemaking Express Terms for 2022 Energy Code Update
(Docket No. 21-BSTD-01)**

Commissioners and Staff:

AFT Guild, Local 1931 submit the following comments on the 45-day language for 2022 Update to Energy Code (“Energy Code”).¹ Our labor unions commend the California Energy Commission’s (“Commission” or “CEC”) for being responsive to stakeholder concerns so far in the code process. We urge you to support a strong building electrification code and commit to an all-electric code in the 2022 Building Code update.

Strong climate action is a must if California is not to be a hindrance to the Biden administration’s goal of cutting greenhouse gas emissions 50% by 2030. This past summer, Governor Gavin Newsom recognized that “across the entire spectrum, our goals are inadequate.” Indeed, a recent analysis by Energy Innovation found that California is not on track to meet its 2030 GHG reduction requirements and recommended accelerated building electrification among the suite of policies to achieve needed additional emissions reductions.² The moment to act is now.

Workers, women, communities of color and low-income people suffer disproportionately from environmental degradation and climate change; and climate change is already harming working families and vulnerable populations through extreme hurricanes, wildfire, drought and flooding, increased stress on the agricultural sector, health impacts like heat stroke and the spread of infectious diseases. Continuing to install fossil fuels in buildings will only worsen these issues for workers and families.

¹ Dkt. No. 21-BSTD-01, TN Nos. 237714-237722(May. 6, 2021).

² Energy Innovation, Insights from the California Energy Policy Simulator (Jan. 2020), <https://energyinnovation.org/wp-content/uploads/2020/01/Insights-from-the-California-Energy-Policy-Simulator.pdf>.

We are encouraged by just transition policies adopted in San Francisco^{3,4} to simultaneously ban fossil fuels in new buildings, while requiring buildings to install grey water and recycled water pipes. We encourage the California Energy Commission to work with other agencies to create a similar policy.

As Californians scramble to prepare for yet another coming fire season—this time while the State is entering another emergency drought—the number of residents living in trepidation is growing, we urge you to adopt a strong electric building code and reignite California’s climate leadership. This is not the time for half-measures. All-electric new construction is a low-hanging climate mitigation strategy that California should adopt now to realize the significant public health, air quality and climate benefits of all-electric buildings and allow the Commission and local governments to singularly focus its resources on equitable electrification of the existing built environment.

Thank you for your consideration of these comments and we welcome the opportunity to further discuss our concerns.

Respectfully submitted,

Jim Mahler, President
AFT Guild, Local 1931

³<https://sfgov.legistar.com/View.ashx?M=F&ID=9405727&GUID=BD33CB0E-74AD-4A5D-9543-4A59142AC58E>

⁴ <https://drive.google.com/file/d/1EPpzwSD61TS4CzKzuJhmnWIQRDBuUyB9/view?usp=sharing>