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RMI Comment - 60+ Organizations Supporting All-Electric Building Code in 2022

Additional submitted attachment is included below.





**MARIN
SONOMA
BUILDING
ELECTRIFICATION
SQUAD**

June 18, 2021

Via online submission

California Energy Commission
Dockets Office, MS-4
1516 9th Street
Sacramento, CA 95814-5512

Re: Comments on Proposed 2022 Energy Code - (Docket No. 19-BSTD-03)

Dear Commissioner and Staff:

On behalf of the undersigned organizations and our hundreds of thousands of members and supporters in California, we urge the Energy Commission to revise the proposals to include an all-electric baseline for all building types. By doing so, the 2022 Energy Code would be more aligned with the state's goals on climate, health, and air quality.

Since the Energy Commission commenced development of the 2022 code, over two hundred organizations - ranging from environmental, environmental justice and public health groups, to utilities such as PG&E, to air districts and local governments, to architectural and business associations - have urged adoption of an all-electric building code. Many organizations provided substantial analysis demonstrating that all-electric new construction results in significant climate, air quality and public health benefits, lowers construction costs compared to homes that continue to rely on gas, and avoids the stranded asset impacts from continuing to expand fossil fuel infrastructure with gas pipelines to new homes.

To be a leader in the fight against the climate crisis, California must take more aggressive action in the building sector. Research has shown that this sector is a major contributor to climate emissions and poor air quality. Gas in homes and buildings have numerous negative impacts, yet California continues to add more gas customers than any other state.¹ We cannot avoid the worst impacts of climate change without eliminating the pollution emitted from gas appliances in our homes and buildings.

Our organizations appreciate the work done by the Energy Commission to move the needle on building decarbonization. However, the current proposal for the 2022 Building Code must be strengthened and include an all-electric baseline for all building types. Such an inclusion will be more protective of our climate and public health.

¹ From 2013-2017, the state added nearly 250,000 new gas customers, and in 2018 alone 75,000 new California homes were built with gas infrastructure. U.S. Energy Information Administration, *Number of Natural Gas Consumers*, https://www.eia.gov/dnav/ng/NG_CONS_NUM_DCU_SCA_A.htm; Green, et al., California Should Go All-Electric in New Construction - State's Largest Utility Agrees, RMI (June 26, 2020), <https://rmi.org/california-should-go-all-electric-in-new-construction-states-largest-utility-agrees/>.

Sincerely,

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