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Submitted On: 6/20/2021
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Comments on Title 24 2022 Energy Code Update (21-BSTD-01)

Please send attached letter.

Additional submitted attachment is included below.



20 June, 2021

To: California Energy Commission

Re: Comments on Title 24 2022 Energy Code Update (21-BSTD-01)

The [San Diego Building Electrification Coalition](#) (SDBEC) is an alliance of community, labor, business, faith, justice, and environmental organizations coming together to advance electrification in residential and commercial buildings.

The SDBEC would like to thank the Commission for considering all-electric building codes for the upcoming 2022 Title 24 code cycle. The SDBEC, along with hundreds of local and state environmental, public health, and government organizations have urged the California Energy Commission (CEC) to adopt strict all-electric building codes for some time now, but unfortunately, the newest CEC draft building codes fall well short of the all-electric target.

All-electric building codes are critical in meeting local and state-mandated Greenhouse Gas (GHG) reduction targets which are required to fight the existential threat we all face from the escalating climate crisis. It is well documented that using natural gas in the buildings we live and work in not only contributes over 10% of the State's total GHG emissions but adversely affects occupant health and well-being due to increased rates of respiratory illness, cardiovascular diseases, premature deaths and susceptibility to viruses¹.

The current CEC draft proposal unfortunately does not go nearly far enough to mitigate the harm from burning fossil fuels in buildings. The current draft proposal only requires one installed all-electric appliance and that buildings be pre-wired to be all-electric "ready" for most new construction. Although this is a step in the right direction, it still allows for natural gas infrastructure to be installed in these buildings. Unfortunately, this will "lock in" GHG emissions from these buildings for decades.

As a result, we are urging the CEC to adopt all-electric building codes since it is the best way to meet emission targets and improve the health of all Californians. Yet there are many other positive reasons to adopt all-electric building codes. First, going all-electric in new buildings will provide significant construction and operational cost savings. Research published by E3, a US energy consulting firm, has shown that construction costs can be reduced anywhere between \$1,500 and \$5,700 per unit depending on the type of building. Second, operational costs can be reduced by up to \$100 per month when compared with natural gas burning appliances². Third, are the new high-paying jobs that will be created from the adoption of these codes. A UCLA study has found that electrifying California's buildings by 2045 would create 100,000 full time workers in the construction industry³. Lastly, all-electric buildings do not pollute the indoor environment like fossil fuel appliances do, which dramatically improves indoor air quality and occupant health. It is a win-win scenario.

¹ <https://ucla.app.box.com/s/xyzt8jc1ixnetiv0269qe704wu0ihif7>

²

https://www.ethree.com/wp-content/uploads/2019/04/E3_Residential_Building_Electrification_in_California_April_2019.pdf

³ <https://innovation.luskin.ucla.edu/california-building-decarbonization/>

In conclusion, we urge the commission to continue the State of California’s climate leadership by adopting all-electric building codes for the upcoming 2022 cycle. Doing so will allow the State to meet its GHG reduction targets, reduce building construction and operation costs, create high paying jobs, and provide buildings that increase occupant health. Waiting until the 2025 building code update cycle to go all electric is much too late. Please use the opportunity before you to make the correct, just and critical choice by mandating the buildings we live and work in be all-electric.

Sincerely,

 <p>Ann Feeney Strategy Committee Chair San Diego Building Electrification Coalition info@sdbec.org</p>	 <p>Colleen FitzSimons Executive Director San Diego Green Building Council</p>	 <p>HAMMOND CLIMATE SOLUTIONS <i>Dynamic Action for a Sustainable Planet</i></p> <p>Tara Hammond Founder & CEO Hammond Climate Solutions</p>
 <p>Susan Wayo Board Member & Secretary Center for Community Energy</p>	 <p>Peter Zahn, CEO Futures Unbound</p>	 <p>Matthew Vasilakis Co-Director of Policy Climate Action Campaign</p>
 <p>Jim Miller Vice President AFT 1931</p>	 <p>Kelly Lyndon Co-chair Building Electrification San Diego 350</p>	 <p>Maleeka Marsden, Chair San Diego Green New Deal Alliance</p>



 <p>The Climate Reality Project SAN DIEGO CHAPTER</p> <p>Marie Chen Climate Policy Team Lead The Climate Reality Project San Diego Chapter</p>	 <p>Lori Thiel President League of Women Voters of San Diego</p>	 <p>SAN DIEGO COASTKEEPER</p> <p>Lucero Sanchez Community Policy Coordinator San Diego Coastkeeper</p>
 <p>Adam Cooper Political Action Team Leader Sunrise Movement San Diego</p>	<p>CLIMATE JUSTICE Climate Change is a Moral Issue</p>  <p>First Unitarian Universalist Church of San Diego</p> <p>Rhea and Armin Kuhlman Co-Chair, Climate Justice Team First Unitarian Universalist Church of San Diego</p>	 <p>Suzanne Hume Educational Director & Founder CleanEarth4Kids.org</p>
 <p>Luke Stroth Green New Deal at UCSD</p>	<p>North County NCCCA Climate Change Alliance</p> <p>Marian Sedio Board Member North County Climate Change Alliance</p>	 <p>Tyson Siegele Energy Analyst The Protect Our Communities Foundation</p>
	 <p>Interfaith Coalition FOR EARTH JUSTICE</p> <p>Philip Petrie Acting Coordinator Interfaith Coalition for Earth Justice</p>	