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<th><strong>Docket Number:</strong></th>
<th>21-BSTD-01</th>
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<tr>
<td><strong>Project Title:</strong></td>
<td>2022 Energy Code Update Rulemaking</td>
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<td><strong>TN #:</strong></td>
<td>238307</td>
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<tr>
<td><strong>Document Title:</strong></td>
<td>San Diego Building Electrification Coalition Comments on Title 24 2022 Energy Code Update (21-BSTD-01)</td>
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<tr>
<td><strong>Description:</strong></td>
<td>N/A</td>
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<td>System</td>
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<td><strong>Organization:</strong></td>
<td>San Diego Building Electrification Coalition</td>
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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 viruses.

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 appliances. 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 industry. 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
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,

Ann Feeney  
Strategy Committee Chair  
San Diego Building Electrification Coalition  
info@sdbec.org

Colleen FitzSimons  
Executive Director  
San Diego Green Building Council

Tara Hammond  
Founder & CEO  
Hammond Climate Solutions

Susan Wayo  
Board Member & Secretary  
Center for Community Energy

Peter Zahn, CEO  
Futures Unbound

Matthew Vasilakis  
Co-Director of Policy  
Climate Action Campaign

Jim Miller  
Vice President  
AFT 1931

Kelly Lyndon  
Co-chair Building Electrification  
San Diego 350

Maleeka Marsden, Chair  
San Diego Green New Deal Alliance
<table>
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<tr>
<th><strong>The Climate Reality Project</strong>&lt;br&gt;SAN DIEGO CHAPTER</th>
<th><strong>LEAGUE OF WOMEN VOTERS OF SAN DIEGO</strong></th>
<th><strong>SANDIEGO COASTKEEPER</strong></th>
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</table>
| Marie Chen  
Climate Policy Team Lead  
The Climate Reality Project  
San Diego Chapter | Lori Thiel  
President  
League of Women Voters  
of San Diego | Lucero Sanchez  
Community Policy Coordinator  
San Diego Coastkeeper |

| **CLIMATE JUSTICE**<br>Climate Change  
Moral Issue | **First Unitarian Universalist Church of San Diego**<br>Rhea and Armin Kuhlman  
Co-Chair, Climate Justice Team  
First Unitarian Universalist Church of San Diego | **CleanEarth4Kids.org**<br>Suzanne Hume  
Educational Director & Founder  
CleanEarth4Kids.org |
|---------------------------------------------------|------------------------------------------|--------------------------|
| Adam Cooper  
Political Action Team Leader  
Sunrise Movement San Diego | Marian Sedio  
Board Member  
North County Climate Change Alliance | Tyson Siegele  
Energy Analyst  
The Protect Our Communities Foundation |
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<th><strong>GREEN NEW DEAL</strong>&lt;br&gt;UCSD</th>
<th><strong>NCCCA</strong>&lt;br&gt;Climate Change Alliance</th>
<th><strong>Interfaith Coalition</strong>&lt;br&gt;FOR EARTH JUSTICE</th>
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</table>
| Luke Stroth  
Green New Deal at UCSD | Marian Sedio  
Board Member  
North County Climate Change Alliance | Philip Petrie  
Acting Coordinator  
Interfaith Coalition for Earth Justice |

**Contact:**
- www.sdbec.org
- info@sdbec.org