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updates to 2022 Building Energy Efficiency Standards (Title 24, Part 6)

We are in a climate emergency, and yet the CEC is taking an incremental approach to building electrification- a phased approach is not enough to prevent the worst effect of climate change and the CEC must be a bigger part of the solution. There are already many solutions/options available to consumers (residential and nonresidential), a phased approach is not needed. Electric appliances are readily available to meet the needs of all-electric buildings. The 2022 code should have strengthened and expanded electric-ready requirements: Making new buildings electric-ready costs very little at the time of construction and will ensure that new homes fueled by gas will be able to affordably upgrade to electric appliances in the future.

Waiting three more years for the 2025 update would cost Californians \$1 billion in unnecessary gas infrastructure, and lock them into 3 million tons additional carbon emissions by 2030. Compliance incentives that encourage efficient electric space and water heating: With heat pump baselines set to the largest energy user among space or water heating in each climate zone, the compliance incentive approach has the potential to result in rapid and large-scale adoption of clean electric technologies.

Make heat pump water heaters (HPWH) the baseline for single-family in climate zone 10. Because heating is a relatively small load in climate zone 10, we support adjusting to a HPWH baseline to send a strong incentive toward decarbonization in this region. Expand the compliance incentive to system types most commonly used in large buildings. Large non-residential buildings often use multi-zone, packaged, or central HVAC and HPWH systems, and there is currently no compliance incentive for the electric heat pump versions of these systems in the Express Terms. Expanding incentives to all system types is needed to shift all new construction to clean electricity, so there is no need to build new gas infrastructure that will become stranded before the end of its life. As a first step, we recommend that the CEC expand the electric baseline systems to all packaged units, such as rooftop units, including those that serve multi zone systems.