

DOCKETED	
Docket Number:	21-BSTD-01
Project Title:	2022 Energy Code Update Rulemaking
TN #:	238319
Document Title:	Silicon Valley Clean Energy Comments on 2022 Energy Code Rulemaking Comments on Building Decarbonization
Description:	N/A
Filer:	System
Organization:	Silicon Valley Clean Energy/Bena Chang
Submitter Role:	Public Agency
Submission Date:	6/21/2021 9:23:40 AM
Docketed Date:	6/21/2021

Comment Received From: Bena Chang
Submitted On: 6/21/2021
Docket Number: 21-BSTD-01

**2022 Energy Code Rulemaking Comments on Building
Decarbonization**

Additional submitted attachment is included below.



333 W El Camino Real, Suite 330 | Sunnyvale, CA 94087 | 1-844-474-SVCE (7823) | SVCleanEnergy.org

June 21, 2021

Docket Number: 21-BSTD-01
California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, California 95814-5512

RE: 2022 Energy Code Update Rulemaking Comments on Building Decarbonization

Dear Commissioners:

Silicon Valley Clean Energy (SVCE) strongly supports the California Energy Commission's (CEC) efforts to accelerate building decarbonization in the 2022 Energy Code Updated Rulemaking for residential and commercial buildings. Electrification of buildings is vital if California is to achieve its landmark 2030 and 2045 climate change goals.

SVCE supports equitable electrification across the state and acknowledges that the removal of natural gas combustion makes buildings safer, healthier, and more environmentally friendly. To support decarbonization, SVCE dedicates more than \$5M a year for decarbonization and resilience programs¹. Our cornerstone program for decarbonizing buildings is our reach code initiative². Through this initiative, SVCE partners with our member agencies in the development and adoption of local amendments to the building code to accelerate all-electric buildings and higher deployments of electric vehicle charging infrastructure. In the current building code cycle, 11 out of 13 SVCE member agencies adopted reach codes³.

Title 24 updates that strengthen and expand the electric-ready building requirements and provide incentives for efficient electric space and water heating will help reinforce and support these local efforts. We strongly urge the CEC to transition towards a building code that is aligned with the state's climate targets by stopping the expansion of gas infrastructure and adopting an all-electric building code for both residential and commercial buildings to use the state's increasingly carbon-free electricity resources in 2022. An all-electric requirement for new construction in the 2022 building code cycle would enable our local governments to focus on the larger challenge of electrifying the existing building stock.

¹ More information about SVCE programs can be found here: <https://www.svcleanenergy.org/programs/>

² <https://www.svcleanenergy.org/reach-codes/>

³ SVCE member agencies that have adopted reach codes as of June 15, 2021: Mountain View, Morgan Hill, Milpitas, Monte Sereno, Saratoga, Los Gatos, Cupertino, Los Altos Hills, Campbell, Los Altos, and Sunnyvale.



333 W El Camino Real, Suite 330 | Sunnyvale, CA 94087 | 1-844-474-SVCE (7823) | SVCleanEnergy.org

We appreciate the CEC's leadership in prioritizing decarbonization in the 2022 Energy Code Update. We look forward to working with the CEC to continue to advance efficient, all-electric construction as a necessary step in addressing the climate crisis.

Sincerely,

A handwritten signature in blue ink that reads "Girish Balachandran".

Girish Balachandran
Chief Executive Officer