

DOCKETED

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Comment Received From: Alice Sung
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Greenbank Associates comment + T24 2022 All-electric

Additional submitted attachment is included below.

Via online submission

California Energy Commission Docket Office MS-4
1516 Ninth Street
Sacramento, CA 95814

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

Dear Commissioner and Staff,

Speaking on behalf of the 10,000+ public pre-K-12 schools in our state, I thank you for the opportunity to comment on the California Energy Commission's (CEC) proposed 2022 Building Energy Code. Many organizations have already provided substantial analysis demonstrating that all-electric new construction results in significant climate, air quality and public health benefits, lowers construction costs compared to buildings that continue to rely on gas, and avoids the stranded asset impacts from continuing to expand fossil fuel infrastructure with gas pipelines to new buildings. To be a leader in the fight against the climate crisis, California must take more aggressive action in the building sector, **now**.

Following up on earlier comments I have made, both in writing and through speaking at public hearings, I urge you to revise the proposals to include a required all-electric baseline for all building types, and short of that; at least for all public sector buildings, with a special emphasis on public pre-K-14 school buildings, including all pre-school, K-12, as well as community college buildings, and higher education.

As infants and youth are more susceptible to the impacts of both indoor and outdoor air pollution compounded by exposures to gas combustion within buildings where they live, learn, play and will actively work in, to say nothing of methane leakages, it is critical that they not be left behind in your consideration. This should also include all in-home and standalone day care centers, early childhood education centers, and child care facilities on campuses.

As you are aware, since these public education facilities are NOT under the local (i.e. municipal Reach Codes) jurisdiction having authority, but rather the State DSA/ State Building Codes themselves, it is imperative that the CEC not wait until the 2025 code to decarbonize this sector to protect the public health, safety, and welfare of our children; especially the over 50% of our public school population that are Title 1 eligible for free and reduced price lunches in low income and disadvantaged frontline communities most impacted by climate change and pollution.

It is also urgent to capture the opportunities of a 2022 all-electric code for both new construction AND retrofitting of existing school buildings in the public PreK-14 schools sector to prepare for and to leverage immediate and future funding programs in some \$100-130 billion in potential federal infrastructure (or other state funding mechanisms) to retrofit/modernize school facilities, to decarbonize, add EV infrastructure, solar and battery storage with SMART inverters/controls technologies for our public schools. This would not only save operating dollars that could be shifted into educational program, it would avoid stranded gas assets, more wisely invest public dollars, and provide all the benefits of a zero carbon school district system, statewide. Thank you for your consideration.

Sincerely,

Alice Sung, AIA, LEED AP, BD+C, ISSP-SA

Principal, Greenbank Associates