

DOCKETED

Docket Number:	21-BSTD-02
Project Title:	2022 Energy Code Update CEQA Documentation
TN #:	238705-1
Document Title:	Consol - Overestimation of Emission and Energy Savings for Single Family Housing
Description:	Email sent to staff on 6/10/2021.
Filer:	Javier Perez
Organization:	ConSol
Submitter Role:	Public
Submission Date:	7/6/2021 3:44:36 PM
Docketed Date:	7/6/2021

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Subject: Overestimation of emission and energy savings for single family housing
Date: Thursday, June 10, 2021 2:52:41 PM
Attachments: [image001.png](#)
[Appendix B - Combined Emissions and Energy Savings CIRB inputs \(1\).xlsx](#)
[CBIA 2004-2020 Housing Production in California \(8-17-20\).xlsx](#)

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Commissioner McAllister and CEC staff;

I am concerned that the CEC Appendix B which estimates energy and emission savings is using incorrect single family housing starts. The CEC uses 119,045 single family starts in 2020 (2022?) while the market was 57,029. This over predicts energy and emission savings for single family homes by more than a factor of two. If these numbers are supposed to represent the “future” market I have attached a slide Bob Raymer and I use that illustrates the housing starts in CA over the last 17 years. The single family housing market has not recovered from the great recession of 2007 through 2009. It may never return to the amount of housing that we were building 15 years ago. The single family market for the past 5 years has hovered around 50,000 single family starts. It improved to the high 50,000 range in 2017 and 2018 and since seems to be receding. It looks like 2021 will be 4-8% below the 2020 mark of 57,029.

I have added the Construction Industry Research Board (CIRB) 2020 housing starts into the published Appendix B. You can review the starts by climate zone by reviewing the green highlighted sections (see SF-HPSD spreadsheet, columns O and V).

ConSol has provided these statistics to CEC Staff over the past few years. I am concerned that the CEC’s housing starts are so far from the current market.

I am happy to explain the CIRB data at your convenience.

Mike

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