

DOCKETED

Docket Number:	22-BSTD-01
Project Title:	2025 Energy Code Pre-Rulemaking
TN #:	253182
Document Title:	Climate First Replacing Oil & Gas (CFROG) CAUSE et al Comments on 2025 Draft Express Terms 11 17 23
Description:	N/A
Filer:	System
Organization:	Climate First: Replacing Oil & Gas (CFROG)
Submitter Role:	Public
Submission Date:	11/17/2023 9:37:09 AM
Docketed Date:	11/17/2023

Comment Received From: Climate First: Replacing Oil & Gas (CFROG)
Submitted On: 11/17/2023
Docket Number: 22-BSTD-01

CAUSE et al Comments on 2025 Draft Express Terms 11 17 23

Additional submitted attachment is included below.



November 17, 2023

California Energy Commission
Re: Docket No. 22-BSTD-01
715 P Street
Sacramento, CA 95814
docket@energy.ca.gov

Re: Ensure Central Coast and Southern California Climate Zones are Included in Residential A/C to Heat Pump Replacement Provisions in 2025 Building Code

Environmental justice communities in the Central Coast continue to bear disproportionate impacts from methane gas infrastructure. Earlier this year, over widespread community protest, this Commission sacrificed the health and safety of Oxnard residents by pushing out the retirement date of the Ormond Beach gas plant an additional three years. Residents in a disadvantaged community in the City of Ventura are now faced with a proposal by Southern California Gas Company to significantly expand a gas compressor station located directly across from an elementary school that is predominantly attended by low-income Latinx children.¹ The stated purpose of the compressor station is to push gas north into Santa Barbara and San Luis Obispo counties and to fill the La Goleta Storage Field to meet winter peak demand. Here again, our community well-being is harmed to meet the energy needs and gas dependency of the region.

The 2025 Building Code is a critical opportunity for the Commission to take meaningful action to reduce the impact of California's crippling reliance on methane gas on disadvantaged communities. Because gas demand in California is substantially higher in winter months and largely determines gas system infrastructure needs, winter gas demand is the primary driver for compression capacity and gas storage facilities. We therefore strongly support proposed advances in the Building Code that move new construction further away from relying on polluting gas for space and water heating to instead relying on efficient zero-emission electric

¹ A.23-08-019, Application of SoCalGas for a Certificate of Public Convenience and Necessity for the Ventura Compressor Modernization Project (Aug, 28, 2023), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M518/K988/518988977.PDF>.

heat pumps.² We also strongly support first-of-their-kind measures in the Draft Express Terms that support heat pump deployment in existing buildings, including provisions for the replacement of residential central air conditioning units with heat pumps.³ Because heat pumps provide both heating and cooling, replacing a central air conditioning unit with a heat pump also displaces the need for gas heating and the need for future gas furnace replacement.⁴

In finalizing the 2025 Building Code, we ask the Commission to ensure that Central Coast and Southern California climate zones continue to be included in this important and commonsense measure for existing buildings. The regions the Ventura Compressor Station would push gas into are in Climate Zones 5 and 6. In Climate Zone 5, the percent of households with central A/C is approximately 41 percent and in Climate Zone 6 it is approximately 12 percent.⁵ Installation of heat pumps when replacing air conditioners will meaningfully contribute to reducing winter gas demand in the region and the corresponding need for compressor capacity in Ventura and gas storage in La Goleta. In addition, the La Goleta Storage Field, along with the Aliso Canyon, Honor Rancho and Playa del Rey storage facilities in Southern California, “present[s] higher health and safety risks than other facilities because of their location near large numbers of people.”⁶ Yet despite these risks to public health and safety – and in the case of Aliso Canyon, repeated promises over the past eight years to shut that facility down – the State has yet to take meaningful action to create the conditions that will enable their closure. Ensuring 2025 Building Code provisions on replacement of central air conditioning with heat pumps apply to Central Coast and Southern California climate zone begins to do so by reducing the need for gas storage to meet winter gas demand.

Thank you for your consideration of these comments.

Kristian Núñez, Policy Advocate
Central Coast Alliance United for a Sustainable Economy (CAUSE)

Haley Ehlers, Executive Director
Climate First: Replacing Oil & Gas (CFROG)

Katie Davis, Chair
Sierra Club Santa Barbara-Ventura Chapter

² These changes include inclusion of both heat pump space and water heating in standard building design for single family residential homes, removal of gas options for building additions, and additional heat pump water heater requirements for multi-family homes. Draft Express Terms §§ 150.1(c), 150.2(a), 170.2(d).

³ Draft Express Terms § 150.2(b)(1)(F)

⁴ With the California Air Resources Board’s 2022 State Implementation Plan (“SIP”) calling for all sales of residential space and water heaters to be zero-emissions beginning in 2030, replacing an air conditioning unit with a heat pump prior to 2030 also avoids the cost of having to replace a gas furnace with a heat pump once these regulations are in place. CARB, 2022 State SIP Strategy at 101 (Sept. 22, 2022), https://ww2.arb.ca.gov/sites/default/files/2022-08/2022_State_SIP_Strategy.pdf.

⁵ Estimate derived from 2019 California Residential Appliance Saturation Study (“RASS”).

⁶ California Commission on Science and Technology, Long-Term Viability of Underground Natural Gas Storage in California, Executive Summary at 4 (2018), <https://ccst.us/wp-content/uploads/Executive-Summary-v2.pdf>.

Julie Henszey, Chair
Ventura Sierra Club

Alan Weiner, Chapter Lead
350 Conejo / San Fernando Valley

Jan Dietrick, Policy Team Leader
350 Ventura County Climate Hub

Teresa Romero, President
Native Coast Action Network

Ana Rosa Rizo-Centino, Network Manager
Central Coast Climate Justice Network

Michael Chiacos, Director of Climate Policy
Community Environmental Council

Faith Grant, Co-Lead
Citizens' Climate Lobby, Ventura County Chapter

Faith Grant, Co-Founder
Conejo Climate Coalition

Faith Myhra, Member
Protect Playa Now

Cc: Chair David Hochschild
Commission Andrew McAllister