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*Comment Received From: Jody London
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**County of Contra Costa - Comments in Support of the Proposed
2025 Building Energy Efficiency Standards**

Additional submitted attachment is included below.

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Conservation and
Development**

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California Energy Commission
715 P Street
Sacramento, CA 95814

May 7, 2024

RE: 24-BSTD-01, 2025 Energy Code Rulemaking

Dear California Energy Commission:

The County of Contra Costa (Contra Costa County) thanks the California Energy Commission (CEC) for its work in developing the proposed 2025 Building Efficiency Standards. With nearly 25 percent of greenhouse gas (GHG) emissions in Contra Costa County coming from buildings, we recognize the significance and urgency around transitioning the building stock away from fossil fuels to achieve our emissions reduction targets both in our county and at the state level. In addition to meeting State and local climate action goals, there are many benefits of all-electric buildings. Building occupants experience cleaner air and improved health by eliminating emissions associated with fossil fuels as well as improved resilience against power outages, particularly when electric technologies are paired with battery storage. They also avoid the costs related to installation and/or maintenance of fossil fuel infrastructure. Contra Costa County is fully supportive of the proposed standards, which serve as an incremental step toward meeting these climate goals.

In 2022, the Contra Costa County Board of Supervisors (BOS) adopted an ordinance requiring most new construction permitted by the County to be all-electric. Contra Costa County suspended enforcement of the all-electric ordinance in February 2024, in response to the U.S. Court of Appeals for the 9th Circuit decision overturning the lower court decision upholding the Berkeley Ordinance banning natural gas in new construction. As County staff work to identify alternative approaches for eliminating GHG emissions from our building stock, it has become apparent that the GHG emission reduction targets established in SB 32 and Executive Order B-55-18 will require more action at the state level. While local ordinances and reach codes are critical to meeting GHG emission reduction targets from buildings in Contra Costa County, our reach is limited to our jurisdiction. The state must lead by example through increased funding

and incentive programs, legislative mandates, and increasingly stringent building efficiency standards.

Contra Costa County applauds the CEC for integrating several updates to the proposed 2025 Building Efficiency Standards that will help jurisdictions in California reduce GHG emissions and reach their climate action goals. These updates include:

- **Single-family Heat Pump Standards:** Updating the existing prescriptive requirements for heat pump space heating and establishing heat pump water heaters as the prescriptive baseline in single-family buildings represents a significant advancement. These systems provide a method for reducing dependency on fossil fuels, and they offer substantial energy savings and better air quality for residents.
- **Thermal Insulation Requirements:** The proposed requirements for insulation in single-family, multifamily, and nonresidential buildings are pivotal for decreasing energy needs in buildings throughout California. Enhancing thermal insulation helps in maintaining a consistent indoor temperature, thus lowering the reliance on heating and cooling systems. This not only reduces energy consumption but also contributes to a substantial decrease in utility bills for residents and businesses, promoting a sustainable and cost-effective building practice.
- **Solar-Ready Roofs for New Construction:** The proposed updates to the standards around solar photovoltaics (PV) and battery storage across all building types will help to meet state and local climate goals by reducing reliance on non-renewable energy sources and reducing GHG emissions. This update aligns with local and state climate action policies and positions building owners to comply with increasingly stringent energy efficiency regulations.

Contra Costa County is supportive of the CEC's proactive steps in revising the Building Efficiency Standards for 2025. These enhancements not only align with our local efforts but also bolster the broader objectives of California's climate action plans. We urge the CEC to continue its leadership in this area, pushing for robust standards that pave the way for a sustainable and environmentally responsible future.

Should you have any questions about Contra Costa County's work on all-electric buildings and other climate action priorities, please contact me at 925-655-2815, Jody.London@dcd.cccounty.us.

Sincerely,

/s/

Jody London, Sustainability Coordinator
Contra Costa County