

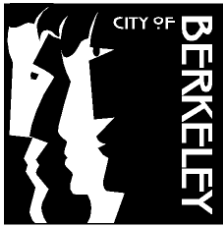
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Project Title:	2019 Building Energy Efficiency Standards PreRulemaking
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Document Title:	Support for Societal Cost of Carbon
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Comment Received From: Billi Romai, City of Berkeley
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Support for Societal Cost of Carbon

Additional submitted attachment is included below.



**Office of Energy and
Sustainable Development**

September 18, 2017

Re: 2019 Building Energy Efficiency Standards

The City supports the Commission's on-going effort to achieve cost-effective energy savings and greenhouse gas emissions reductions through the adoption of updates to the Title 24 Building Energy Efficiency Standards. We appreciate the opportunity to comment on the California Energy Commission (CEC) 2019 CALGreen Voluntary Energy Efficiency Standards on August 30th, 2017.

As a local jurisdiction with an ambitious Climate Action Goals, we are writing to support the comments made by NRDC, Build It Green and the Sierra Club advocating for the inclusion of a societal cost of carbon (SCC) to facilitate deep reductions in carbon pollution from new homes. As the city of Berkeley examines ways to cut our climate impacts and we look to 2019 CALGreen to help us achieve real emissions reductions and carbon neutral buildings. We encourage CEC to implement the SCC feature in a way that immediately allows local jurisdictions using reach codes based on a societal cost of carbon to comply with both Parts 6 and 11 of the building code.

We appreciate the opportunity to provide this input, and thank CEC for its careful consideration of our comments.

Respectfully submitted,

Billi Romain
Interim Manager Office of Energy and Sustainable Development