

DOCKETED

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Docket #17-BSTD-01, 2019 Building Energy Efficiency Standards PreRulemaking

Additional submitted attachment is included below.



Office of Energy and
Sustainable Development

October 19, 2017

Commissioner Andrew McAllister
California Energy Commission
1516 Ninth Street, MS-34
Sacramento, CA 95814

RE: Docket #17-BSTD-01, 2019 Building Energy Efficiency Standards PreRulemaking

Dear Commissioner McAllister and staff,

Berkeley, along with other jurisdictions trying to reduce greenhouse gas emissions, is seeking strategies to accelerate the transition from natural gas heating to electric heat pump technology. Given that 75% of Berkeley's residential greenhouse gas emissions come from natural gas, the shift to efficient electric space and water heating powered by renewable electricity in new and existing buildings is an important strategy in reaching our community's ambitious Climate Action Plan goals. This transition to renewable electricity also contributes to climate adaptation and resilience by assuring community access to reliable and clean energy.

As such, we support the Commission's on-going efforts to allow for cost-effective building electrification in the 2019 Building Energy Efficiency Standards. In doing so, we hope that the Commission will address the following:

1. **Electric water heating baseline:** Thank you for the Commission's work to provide independent compliance paths for all-electric and gas-heated buildings. These efforts require an electric water heating baseline in both the prescriptive and performance paths. The performance path is critical to encourage adoption and develop the market for heat pump water heaters (HPWHs), as it allows builders to use HPWHs for trade-offs against other costlier requirements. Please see separate comments from the NRDC for details.
2. **Gas availability:** The electric baseline needs to be available whether gas is available or not, as is the case currently with space heating.
3. **Electric-ready requirements:** Please include electric-ready requirements to facilitate future electrification. This is critical to remove barriers and reduce costs for transitioning the building stock to clean energy by 2050.

4. **Societal cost of carbon:** Berkeley, and many other local jurisdictions in California, are interested in reach codes that focus on reducing GHG emissions and ultimately carbon neutrality, not just net zero energy which doesn't address direct emissions from on-site combustion of fossil fuels. We urge the Commission to include a societal cost of carbon in CALGreen 2019 to facilitate local jurisdictions pursuing aggressive climate action goals by setting reach codes based on GHG emissions.

5. **Model Ordinance for Renewable Water Heating:** We also urge the Commission to endorse and publish a model ordinance for renewable water heating as proposed by NRDC and 20+ other stakeholders on May 5. The Commission has done this for the model solar ordinance, and we would like to have a similar option to address water heating GHG emissions as well as emissions from electricity use.

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

Respectfully submitted,

Billi Romain
Interim Manager, Office of Energy and Sustainable Development
City of Berkeley

CC: Christopher Meyer, CEC staff
CEC e-file, Docket #17-BSTD-01