

## DOCKETED

<b>Docket Number:</b>	17-BSTD-02
<b>Project Title:</b>	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
<b>TN #:</b>	222718
<b>Document Title:</b>	Richard Rollins Comments Comments on 2019 Title 24 Building Energy Efficiency Standards Rulemaking 45 - Day Language Update
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Richard Rollins
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/24/2018 3:05:48 PM
<b>Docketed Date:</b>	2/26/2018

*Comment Received From: Richard Rollins*

*Submitted On: 2/24/2018*

*Docket Number: 17-BSTD-02*

## **Comments on 2019 Title 24 Building Energy Efficiency Standards Rulemaking 45 - Day Language Update**

It's clear we need to rapidly decarbonize all sectors of the economy. Buildings are one of the largest sources of GHGs that result from the use of natural gas for space and water heating. The CEC should update the code to facilitate a shift off natural gas to high efficiency, all-electric climate friendly buildings. This will allow buildings to take full advantage of the shift already underway from fossil fuel electric power generation to renewables for electric power generation. Furthermore, this will discourage investment in GHG emitting water heaters and space heating in buildings.

The CEC should use a GHG metric for code compliance, not the TDV energy cost metric which is biased in favor of gas/"mixed-fuel buildings."

Sincerely,

Richard Rollins, P.E.