

<b>DOCKETED</b>	
<b>Docket Number:</b>	18-IEPR-09
<b>Project Title:</b>	Decarbonizing Buildings
<b>TN #:</b>	223983
<b>Document Title:</b>	LA Chamber Comments on Decarbonizing Buildings Workshop
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*Comment Received From: Gary Toebben*  
*Submitted On: 6/27/2018*  
*Docket Number: 18-IEPR-09*

**LA Chamber Comments on Decarbonizing Buildings Workshop**

*Additional submitted attachment is included below.*



**LOS ANGELES AREA**  
CHAMBER OF COMMERCE

June 27, 2018

California Energy Commission  
Dockets Office, MS-4  
Docket No. 18-IERP-09  
1516 Ninth St.  
Sacramento, CA 95814-5512

**Re: Docket No. 18-IERP-09 Decarbonizing Buildings**

Dear Commissioners McAllister and Hochschild:

On behalf of the Los Angeles Area Chamber of Commerce, I would like offer our comments on the Integrated Energy Policy Report (IEPR) decarbonizing buildings workshop. We recognize to reach California's ambitious greenhouse gas emissions goals we must be innovative in our approach to reductions in the building sector.

The Chamber believes that as we work to reduce emissions and increase energy efficiency, regulations should remain fuel and technology neutral. However, this workshops recommendation would prioritize one particular type of energy generation over another.

An intervention of this magnitude would effectively eliminate customer choice and market-driven forces. We're concerned energy bills would increase and businesses would also need to make substantial capital outlays for new equipment and the corresponding upgrades. Many businesses already had to replace their equipment and appliances recently to comply with new local air quality regulations. Per the presentations, these recommendations would require businesses incur significant expenses for upgrades. Businesses operating in narrow margins cannot afford to repeatedly upgrade equipment and requiring them to do so will undermine their viability, impacting jobs, revenue, and tax receipts.

Prioritizing one energy source over others would also increase vulnerabilities to energy outages. Black or brownouts, either natural or man-made causes, could leave California businesses without the necessary energy load to run day-to-day operations. Energy reliability is vital to economic security and that requires a diversity of options and resources.

We should ensure that as many cost effective, efficient, and innovative options are available to reach our emission reduction goals. The IERP decarbonizing buildings workshop recommendations to eliminate near-zero emission technologies would decrease energy choices, increase costs, and reduce energy system reliability. The Chamber encourages the CEC to maintain a diverse and flexible energy portfolio. If you have any questions, please contact Kendal Asuncion, Manager, Public Policy, at [kasuncion@lachamber.com](mailto:kasuncion@lachamber.com) or 213-580-7518.

Sincerely,

A handwritten signature in cursive script that reads "Gary Toebben".

Gary Toebben

President & CEO

