

DOCKETED

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Sierra Club's Written Comments for 2019 IEPR Draft Scoping Plan

Additional submitted attachment is included below.



February 28, 2019

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Written Comments for the 2019 IEPR Proposed Scope and General Schedule

Dear Commissioners:

Sierra Club California appreciates the opportunity to provide these comments to the California Energy Commission (“CEC”) on the 2019 Integrated Energy Policy Report (“IEPR”) Proposed Scope and General Schedule. We support the CEC’s ongoing leadership to accelerate decarbonization of California’s economy, including advancing electrification, energy efficiency, and renewable energy, three pillars of climate change mitigation. However, in order to align with the state’s overarching climate goals, we recommend the CEC more assertively build on the 2018 IEPR to create the pathway to zero emissions in the buildings sector by transitioning away from all fossil fuels, including natural gas.

Thus, Sierra Club California offers the following comments:

1. Energy Equity and Electrification

We agree with the CEC’s focus on ensuring that the benefits of a transformed energy sector are shared by low income and disadvantaged communities. According to the proposed scope, the analysis will include updating the status of implementing the recommendations developed in response to Senate Bill 350 as well as assessing whether charging station infrastructure is disproportionately deployed by certain geographic and population characteristics. We agree that both of these areas deserve attention from the CEC.

We would also urge the CEC to include within its energy equity analysis proposals on how to support low-income and disadvantaged communities in the transition to all-electric homes and buildings. The 2018 IEPR Update appropriately addressed building electrification and the importance in making our homes and buildings zero emission. Thus, the analysis of energy equity for this task is of incredible importance. This may include the consideration of electrification programs such as consumer education, workforce outreach and training, new financial incentives and rebates, as well as on-the-ground support to make the switch from gas to electric. The IEPR needs to encourage electrification of new and existing buildings, with a priority focus on low-income households and multi-family buildings.

2. Energy Efficiency

We support the CEC’s plan to carry out the AB 3232 study of a 40% reduction in GHG emissions in the buildings sector within the 2019 IEPR. As noted in the 2018 IEPR Update, buildings are a major gap

in California's climate change mitigation strategy. A thorough analysis of the pathways to achieve deep decarbonization of the buildings sector, including necessary policy reforms, will be critical to get California's agencies aligned and to transform the market for zero-emission appliances. We note that the AB 3232 study more appropriately fits in its own Building Decarbonization chapter, as a 40% reduction in GHGs in the buildings sector will entail more than energy efficiency alone.

3. Building Decarbonization

The 2018 IEPR Update appropriately led with a chapter on Building Decarbonization, making it clear that electrification is the most viable path to zero-emission buildings. The 2019 IEPR should build upon this chapter and have a dedicated chapter to Building Decarbonization, which should include the AB 3232 study. As noted above, AB 3232 entails a study of multiple strategies to decarbonize buildings, and goes beyond energy efficiency. Building decarbonization is emerging as a statewide and national priority for climate change mitigation and is a complex issue that will merit staff workshops with stakeholders and public comment periods. Folding building decarbonization within energy efficiency may risk that the decarbonization issues do not get the attention required.

4. Transportation

We support the topics identified within the transportation section. In addition, we recommend a discussion of actions that automakers and dealers can take, or policies that should be developed, to help accelerate and facilitate a more robust electric vehicle market sooner.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lauren Cullum', with a long, sweeping flourish extending to the right.

Lauren Cullum
Policy Advocate