

<b>DOCKETED</b>	
<b>Docket Number:</b>	19-BSTD-01
<b>Project Title:</b>	Draft 2019 Alternative Calculation Method Reference Manuals and Compliance Software Tools
<b>TN #:</b>	227239
<b>Document Title:</b>	Mark Kelly Comments Multi-family and Commercial de-carbonization
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Mark Kelly
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/3/2019 11:49:12 AM
<b>Docketed Date:</b>	3/4/2019

*Comment Received From: Mark Kelly*  
*Submitted On: 3/3/2019*  
*Docket Number: 19-BSTD-01*

## **Multi-family and Commercial de-carbonization**

I request that the Energy Commission create an independent baseline for all-electric commercial and multifamily buildings to create a level playing field for electric heating and hot water, and stop artificially favoring gas. Electric systems are more cost effective to build and operate, supporting more affordable housing. With California's clean renewable electricity grid, electric heating has much lower carbon emissions. Please take this step now rather than locking in gas infrastructure for three more years waiting for the next code cycle. There's no reason to delay incorporating this into the code now to help California move faster toward our housing and climate goals.

California now burns more natural gas in our buildings than in our power plants. We cannot meet our climate commitments if we continue to use gas to heat our buildings and hot water. The design and construction industry has seen cost savings going all electric by eliminating the gas service to the building and using heat pumps. With a level playing field vis-a-vis the codes, the potential savings will certainly increase to the benefit of the community and the environment.