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## **Separate baseline for electric & gas**

We are requesting that a separate baseline for all-electric buildings to be included in the 2019 ACM for multifamily and non-residential buildings. While Hawaii was the first state to deal with renewables over-production, California is going to be the biggest. As we continue to add renewables to our grid and increase our production, it is critical that we remove all disincentives for owners and designers choosing all-electric building systems choices which we know that we need to do more of to meet the state's carbon reduction goals in AB32 and other legislature. Adding more electric space heating to buildings will not only help with carbon reduction goals but also help with winter demand-production balance as we enter into an ever increasing renewable fraction in our grid energy portfolio. It is our opinion that increasing electric space heating and DHW heating with thermal storage is going to be one of the most cost-effective ways to help a "smart grid" deal with our new grid demand and production challenges.

The Multi-family and non-residential sectors new construction over the upcoming years represent far too much additional carbon and even the delay of 3 years will make an impactful difference towards the state's goals to achieve our carbon reduction goals.