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## **Independent baseline for all-electric buildings**

We believe that the proposed regulations artificially favor natural gas over electricity in commercial buildings and multi-family housing. The new 2019 code fixed this old feature for homes, which previously favored gas heating and hot water and penalized electric low-carbon solutions. It's time to create a level playing field for all electric heating and hot water systems and to stop favoring carbon-generating gas.

This is particularly important for multi-family housing, where 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.