

DOCKETED	
Docket Number:	19-BSTD-01
Project Title:	Draft 2019 Alternative Calculation Method Reference Manuals and Compliance Software Tools
TN #:	227343
Document Title:	David Gregory Comments alternative all-electric baseline
Description:	N/A
Filer:	System
Organization:	David Gregory
Submitter Role:	Public
Submission Date:	3/15/2019 9:45:03 AM
Docketed Date:	3/15/2019

Comment Received From: David Gregory
Submitted On: 3/15/2019
Docket Number: 19-BSTD-01

alternative all-electric baseline

I'm writing to request that you include an alternative all-electric baseline for code compliance energy modeling. Energy code or modeling standards that bias new construction to include natural gas raises housing costs and risks creating stranded assets as electricity becomes the low-carbon go-to energy source.

Establishing an independent baseline for all-electric commercial and multifamily buildings would create a level playing field for electric heating and hot water, and stop artificially favoring gas. Since electric service is already installed, natural gas is a redundant system, raising development and housing costs and reducing the affordability of housing. Also, California's clean renewable electricity grid means electric heating can have 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.