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December 10, 2019

Docket No. 19-BSTD-06 California Energy Commission 1516 Ninth Street Sacramento, CA 95814

RE: Sierra Club California Comments Supporting Local Reach Codes

Dear Commissioners:

Sierra Club California is writing in strong support of the local reach codes that are before the California Energy Commission ("CEC").

The cities and counties that have adopted these reach codes are leading the state in the transition to a healthier, more affordable future. Our state needs local policies such as these to help meet our climate goals and to reduce air pollution and associated health problems.

These reach codes will not only reduce our greenhouse gas emissions, but they are essential in making housing more affordable, lowering the cost of new construction, reducing air pollution, both indoor and outdoor, and other health and economic impacts, as well as making our communities more resilient in the face of climate change. That is why more than 50 cities and counties are considering taking similar local action to require or incentivize new construction to be all-electric.

In addition, most of the reach codes before the CEC were unanimously approved by city council meetings and broadly supported by community members. These reach codes are the result of statewide cost-effectiveness analysis by the IOU Codes and Standards Team, and extensive stakeholder engagement.

Therefore, Sierra Club California urges you to approve these reach codes, as well as to adopt state policies that build upon them to rapidly decarbonize California's buildings. As a first step, the CEC should ensure that Title 24 Building Energy Efficiency Standards (2022 code cycle) is explicitly focused on clean energy, all-electric new construction. A policy recommendation that is supported by the CEC's own reports, including the 2018 Integrated Energy Policy Report and the 2019 draft E3 Future of Gas study.

Sincerely,

Lauren Cullum Policy Advocate