

**DOCKETED**

<b>Docket Number:</b>	19-BSTD-03
<b>Project Title:</b>	2022 Energy Code Pre-Rulemaking
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*Comment Received From: Licha Lopez  
Submitted On: 6/24/2020  
Docket Number: 19-BSTD-03*

**Support letter to state and local government policies that promote all-electric new construction**

*Additional submitted attachment is included below.*



**Robert S. Kenney**  
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June 23, 2020

California Energy Commission  
Docket Unit, MS-4  
Re: Docket No. 19-BSTD-03  
1516 Ninth Street  
Sacramento, California 95814-5512

Pacific Gas and Electric Company (PG&E) is proud to provide electric and natural gas service to our customers. And we are committed to helping customers and the community achieve their energy goals. As part of this commitment, PG&E welcomes the opportunity to support the California Energy Commission's efforts to advance efficient, all-electric new construction, when it is feasible and cost-effective, through the forthcoming rulemaking for the 2022 iteration of California's Energy Code (Title 24, Part 6).

PG&E strongly supports California's climate and clean air goals. We recognize that achieving these goals require a range of approaches and tools, including increasing the use of energy-efficient electric appliances in buildings when cost-effective. PG&E welcomes the opportunity to avoid investments in new gas assets that might later prove underutilized as local governments and the state work together to realize long-term decarbonization objectives. With all this in mind, PG&E supports state and local government policies that promote all-electric new construction when it is feasible and cost-effective. PG&E supports and encourages investment in the supporting code compliance and enforcement tools and resources that will be needed to implement the evolving requirements in the forthcoming 2022 Energy Code.

Beyond new construction, PG&E believes a multi-faceted approach is needed to cost-effectively achieve California's broader economy-wide long-term GHG reduction objectives, including both electrification and decarbonizing the gas system with renewable natural gas and hydrogen. As California's decarbonization policies evolve, PG&E will continue to ensure the safe and reliable operation of the electric and gas systems to continue supporting the customers that depend on us.

PG&E appreciates the opportunity to comment and support the Energy Commission during its triennial rulemaking process, including through our role as statewide leads for the Codes & Standards program. Participating in the rulemaking process, and utilizing the time between code adoption and the effective date, allows us to prepare for the future and continue providing the best service possible to customers. PG&E continuously forecasts load in its service territory and implements upgrades to the distribution grid to meet the demand. PG&E fully expects to meet the needs that all-electric buildings will require. PG&E remains ready to engage with our customers, local government, businesses, and community members to meet their needs safely, reliably, affordably, and with clean energy.

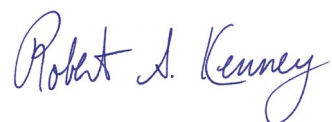
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PG&E looks forward to continuing to work with the California Energy Commission to accomplish its policy goals.

Thank you, and have a safe day.

Sincerely,

A handwritten signature in blue ink that reads "Robert S. Kenney". The signature is written in a cursive style with a large, looped 'R' and 'K'.

Robert S. Kenney  
Vice President

cc: Mark Krausse