

DOCKETED

Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	234207
Document Title:	350 Bay Area Comments on 2022 Energy Code Pre-Rulemaking
Description:	N/A
Filer:	System
Organization:	350 Bay Area
Submitter Role:	Public
Submission Date:	8/3/2020 4:16:05 PM
Docketed Date:	8/3/2020

*Comment Received From: 350 Bay Area
Submitted On: 8/3/2020
Docket Number: 19-BSTD-03*

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Additional submitted attachment is included below.



350 Contra Costa
350 East Bay
350 San Francisco
350 Marin
350 Sonoma
Napa Climate NOW!

August 3, 2020

California Energy Commission
Docket Office, MS-4
1516 Ninth Street
Sacramento, CA 95814
docket@energy.ca.gov

Re: Docket No. 19-BSTD-03

Dear Commissioners,

Thank you for giving 350 Bay Area a chance to share our views on this important topic. We are very much in support of the efforts of the Energy Commission to come up with building codes that establish a requirement that new building construction should be all-electric for its Title 24 2022 building code update. We also support a move to an EV charging infrastructure requirement for new construction as part of the change. We must dramatically decrease our transportation emissions as well as those coming from inefficient buildings and can help this along with decreasing barriers to people switching from combustion based transport.

350 Bay Area is a non-profit, climate justice organization, founded in 2012 to educate the public and mobilize its members to act on getting us back to our previous stable climate and moving us away from our planet's climate emergency. We act in many settings as policy advocates to increase the percentage of renewable energy and decrease our reliance on fossil fuel based energy. We are over 18,000 volunteers and activists in the nine county SF Bay Area who are also ratepayers and taxpayers among those in California that are bearing the burden of the costs of adaptation to climate breakdown.

There are so many costs related to natural gas, many of them to our climate goals, with methane leaks all through its life cycle of getting it to the customer. We see it in storage at facilities like Aliso Canyon where one the worst climate disasters in California history happened, and also in

its harm in accelerating fires that move through our communities and the potential for accelerating the damage done by earthquakes. There are also the other environmental costs related to fracking for natural gas. The sooner we move to electricity that is increasingly being generated from renewable sources, paired with battery storage, and which also will increasingly power our transportation sector, the sooner we will make sure that any infrastructure that we build or must maintain for natural gas will not be a stranded cost we pay years into the future, unnecessarily.

There has already been a strong movement in the state by cities moving to choose reach codes that establish all-electric for new building construction, a sign that the state is ready for a new direction now. These cities' big task is to find ways to remove gas from older buildings, but getting a clear message from the state on new residential and commercial building construction will encourage them to go in this direction. New construction all electric mandates can also accelerate building retro-fit efforts. The market for, and contractor and HVAC installer experience with, heat pump water and space heating, as well as induction cooking, will expand rapidly. New buildings will last long past the time when the grid will have 100% renewable energy running through it.

There is also an environmental justice element to decreasing dependence on natural gas. More housing is clearly needed in California and much of it will need to be for those needing affordable housing. If a higher percentage of homes are going to be built for the lower-income and disadvantaged population, shouldn't it be as inexpensive to build as possible and be as free of indoor pollution as possible? Not having to build natural gas access for new homes make building them less expensive and having them built with electric heat-pumps will allow both heating and air conditioning to be provided without the indoor air pollution and with substantially increased energy efficiency.

For these and other reasons we appreciate you moving the state forward away from fossil fuels for energy and urge you to establish a strong all-electric building energy efficiency base going forward from 2022 in this proceeding.

Sincerely,



Ken Jones
Clean Energy Campaign Lead
350 Bay Area