

DOCKETED

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Urging the CEC to Adopt an All-Electric Building Code in 2022

Additional submitted attachment is included below.



August 10, 2020

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

docket@energy.ca.gov

Dear Commissioners:

On behalf of the City of Hayward, I thank you for the opportunity to comment on the California Energy Commission's (CEC) 2022 Building Energy Efficiency Standards. **I strongly urge the CEC to transition towards a building code that is aligned with the state's climate targets by stopping the expansion of gas infrastructure and adopting an all-electric building code for both residential and commercial buildings to utilize the state's increasingly carbon-free electricity resources in 2022.**

As you are aware, California has adopted aggressive greenhouse gas (GHG) emission reduction targets, including 40% below 1990 by 2030, and carbon neutrality by 2045. In support of these goals, the state has set in motion sweeping policy initiatives focused on decarbonization of the electricity sector and the transportation sector. For California to meet its climate goals, the state must also address the 26% of statewide GHG emissions¹ that come from California buildings.

Decarbonizing the building sector also provides other benefits for Californians: most specifically cost savings and improved indoor air quality. New all-electric homes can expect a lifecycle savings of \$130 – \$540 per year when compared with gas-fueled new construction². Furthermore, building electrification also shields ratepayers from the volatile and rising price of gas. Expanding gas infrastructure also adds to construction cost and time, contributing to the housing affordability crisis.

All-electric homes additionally offer health benefits due to the elimination of air pollutants emitted by gas appliances such as carbon monoxide (CO), nitrogen oxides (NO_x) including nitrogen dioxide (NO₂), particulate matter (PM), and formaldehyde, which have been linked to various acute and chronic health effects, including respiratory illness, cardiovascular disease, and premature death.³ The risks of these air pollutants are most

¹ Emissions from buildings include fuel combustion, methane, refrigerants, and onsite electricity generation.

² Residential Building Electrification in California. Energy and Environmental Economics (2019).



acute for apartments, due to a smaller residence size, which puts low-income communities at higher risk.

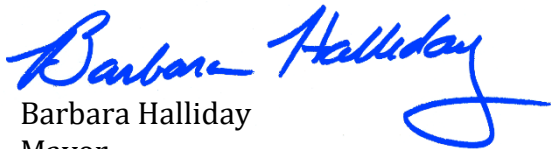
What's more, with a third of California's 2045 buildings stock being built in the next 25 years, building industry stakeholders (i.e. manufacturers, architects, real estate agents, builders and contractors) urgently need a clear signal from the state to move towards all-electric construction.

So far, 31 communities, including Hayward, have already adopted reach codes and local ordinances that prioritize or require all-electric new construction, piloting effective policies that act as a roadmap for communities across California and regulatory leaders like the CEC.

Hayward's reach code, approved by the CEC in June this year, requires that all new low-rise residential buildings be all-electric and encourages all-electric for high-rise residential and non-residential buildings. In January this year, the Hayward City Council adopted a Strategic Roadmap listing the City's key priorities for the next three years – one of which is to explore the feasibility of banning natural gas in non-residential buildings. As other cities and counties across California file their reach codes and commit to the state's climate goals, the patchwork of clean energy building codes across the state will make it more complicated for building stakeholders to navigate.

The City of Hayward is committed to help solve climate change by lowering California's GHGs, making housing more affordable in our communities, and protecting the health of our residents. Newly constructed buildings will be in use for decades and continuing to connect new buildings to gas makes it much harder and costlier to convert them to clean electricity later. For all the reasons mentioned above, we strongly believe all-electric new construction is a no-regrets strategy that will help our goals. Therefore, we urge the CEC to move as quickly as possible and adopt an all-electric code in 2022. We look forward to collaborating with the CEC and other interested stakeholders through the building code development process.

Sincerely,


Barbara Halliday
Mayor

Cc: Hayward City Council
Hayward City Manager