

DOCKETED

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September 1, 2020

California Energy Commission
Docket Unit, MS-4
Re: Docket 19-BSTD-03
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 19-BSTD-03 – Center for Sustainable Energy® support for a 2022 Energy Code that promotes all-electric new construction

Dear Commissioners and Staff:

The Center for Sustainable Energy® (CSE) appreciates the opportunity to comment on the California Energy Commission's (Energy Commission) 2022 Building Energy Efficiency Standards (Energy Code). CSE strongly supports a 2022 Energy Code that promotes all-electric new construction of commercial and residential buildings as a necessary step in achieving the State's landmark climate goals and improving public health.

CSE is a 24-year-old national nonprofit driven by one simple mission – decarbonize. We provide program administration, technical assistance, and policy advisement, and we serve as a trusted and objective resource helping government agencies implement successful sustainable energy programs that use public funds appropriately and in the best interest of their communities. Our vision is a future with sustainable, equitable, and resilient transportation, buildings, and communities.

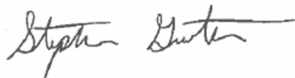
Building decarbonization is core to achieving this vision, and electrification is a cost-effective and feasible strategy in many use cases to significantly reduce greenhouse gas (GHG) emissions associated with building energy use. While CSE recognizes that some combustion fuel technologies and other non-electric alternatives will play an important role in California's decarbonization pathway, these resources should be limited to end-uses that currently are difficult to electrify or make use of on-site fuels by capturing otherwise harmful emissions. Nevertheless, all-electric residential and commercial new construction is a proven economical, clean, and safe option that should be required to the extent it is cost-effective and feasible through the 2022 Energy Code.

As California's electricity system continues to move closer to zero-carbon generation, as mandated by Senate Bill 100, promoting all-electric new construction helps set the built environment on a path that is aligned with the State's necessary climate goals. In addition,

avoiding the use of combustion fuels within residential and commercial buildings improves indoor and local air quality by reducing pollutants that have been linked to public health concerns such as higher asthma rates. This is especially important for communities that have disproportionately felt the negative impacts of pollution from the direct combustion of fossil fuels. State building codes are a principal regulatory mechanism for ensuring future public health and GHG emissions reduction benefits. Continuing to require gas hookups and additional infrastructure in new buildings only further exacerbates the issues of stranded assets and potential cost shifting and makes it more difficult to achieve a just transition as California moves toward a carbon-free future. As such, the Energy Commission should not delay cost-effective all-electric code requirements to the 2025 Energy Code update.

CSE also supports the continued integration of building and energy codes with other decarbonization strategies. Promoting electric vehicle infrastructure and advanced controls for demand management through the 2022 Energy Code will further ensure progress towards a carbon-free future. Lastly, in parallel with building code updates, CSE encourages the Energy Commission to continue to closely coordinate with the California Public Utilities Commission and other state agencies to ensure that rate design and regulatory policies compliment all-electric buildings to ensure the safe, clean, affordable, and equitable delivery of energy to all Californians.

Sincerely,



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