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**League of Women Voters of California Comment on 2022 Energy
Pre-Rulemaking**

Additional submitted attachment is included below.



October 5, 2020

Via online submission

California Energy Commission
Docket Office MS-4
Sacramento, CA 95814

**California League of Women Voters Supports an All-Electric Baseline in the 2022 Building Energy Efficiency Standards and a Just and Equitable Transition to Energy Efficient Buildings
(Docket No. 19-BSTD-03)**

Dear Commissioners and Staff:

The League of Women Voters of California writes to urge the California Energy Commission (CEC) to adopt an all-electric baseline for all building types in the 2022 Building Energy Efficiency Standards contingent on implementing policies and programs that will ensure a just and equitable transition to energy efficient buildings for all Californians.

Increasing energy efficiency in existing buildings - including decarbonizing - presents [numerous barriers and challenges](#) but is essential if California is to achieve its climate change goals. The League of Women Voters of California lauds the CEC's efforts in identifying the barriers to decarbonize all buildings in California. However, the knowledge and insights gained from the numerous studies undertaken by the CEC will only be of value if programs are implemented to address these barriers. Adopting an all-electric baseline for all building types in the 2022 Building Energy Efficiency Standards, is only the first step. To decarbonize all buildings, California must commit the resources to enable all Californians to go all electric. This must be done in a just and equitable manner.

As stated in [Aas, et. al. \(2020\)](#), "The potential for large reductions in gas demand creates a new planning imperative for the state....Without a gas transition strategy, unsustainable increases in gas rates and customer energy bills could be seen after 2030, negatively affecting customers who are least able to switch away from gas, including renters and low-income residents." LWVC supports the creation of plans for a just and equitable transition to energy efficient buildings.

In addition to a mandate to decarbonize buildings – which is necessary to meet our climate goals – the plan forward must also include a just and equitable transition for all Californians, designed to prevent burdensome consequences on those who cannot afford to electrify.

Sincerely,

A handwritten signature in black ink that reads "Carol Moon Goldberg".

Carol Moon Goldberg
President