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Bruce Naegel Comments on 2022 Energy Code Pre-Rulemaking

Dear Commissioners,

Thanks for the opportunity to comment on the 2022 Building Code.

Why California should move to an all-electric 2022 Building Code.

Climate change is in front of us. All we need to look at is the wildfire situation to see we need to deal with climate change now.

California has responded with Executive Order B-55-18 for the state to be at carbon neutral by 2045. We now also have Executive order N-79-20 which accelerates the date for all light vehicles zero pollution light vehicles to 2035. We do not yet have an acceleration for the building segment of the economy.

This is where California can show leadership with an all-electric code for new construction buildings moved in from 2025 to 2022. This provides 3 more years of buildings that can be configured for zero GHGs emitted. Over 33 jurisdictions have signed REACH codes that move them towards or to an all-electric building.

Making it work.

There are certain components that need optimization to make this work. The program must be designed with equity across income groups. Part of what will make it work is ensuring the TOU rate tables are optimized. Sufficient solar must be part of the solution so that the all- electric home has the appropriate cost of electricity. We also need to optimize the CARE and FERA programs.

Electric vehicles (EVs) will become more prevalent in the coming years. Provisions in the CalGreen code should help increase EV adoption.

Conclusion:

Climate change is closing in on us as evidenced by the wildfires we are experiencing today. We need to continue to step up the pace in moving to a carbon free economy. We owe our children and grandchildren a habitable California,

The REACH code method helps to set the pace. However, it is harder to implement for many cities than a mandate. We need to make the change work across jurisdictions. An update to the building code provides the change to all. It makes implementation easier.

Thanks again for the opportunity to comment on the 2022 Building Code.