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## **PHCA and NAPHN support and All-Electric Code for 2022**

California's Passive House community would like to lend our support to the growing push to shift our code to an all-electric baseline. We as a community have already found this to be cost-effective in many of our member's high performance projects around the state. We have found this to be true despite not being given sufficient credit in CBECC-Res - and often being penalized - for selecting all-electric HVAC systems while. Since 2015 the Passive House Planning Package (PHPP) has shown that the use of heat pumps, combined with all-electric appliances, is already the most effective pathway to decarbonizing our buildings, using both on-site and off-site renewable energy generation.

Looking ahead, we strongly encourage the California Energy Commission to finally set a clear carbon emissions target for all building types. Professionals and product manufacturers MUST be given a clear signal as to where buildings are eventually heading. This early signaling will provide practitioners and manufacturers a smoother on-ramp than what we are currently experiencing with this electrification transition. All the additional features of high performance buildings that will eventually make their way into California's building code require a learning curve. As we have seen from our now annual wildfire events, our buildings are insufficiently air-sealed and properly ventilated to support healthy indoor air during these wildfire seasons. Our building industry will need to learn the tricks and techniques for how to properly air seal and mechanically ventilate buildings, BEFORE this becomes code. Without sufficient early signally, manufacturers of these products won't deliver the necessary equipment to enable this to become cost-effective. The lack of early market signals keeps California's building product market inadequately resourced, ensuring that high performance options remain out of reach and unaffordable. (This is the same delay that has kept electrification from being recognized earlier by our markets and why it will remain challenging to make this transition until the supply chain catches up to the code. We need a code signaling mechanism that can LEAD, rather than lag. We need a code mechanism that can provide clear direction to where we want the market to head towards.)

We therefore urge the California Energy Commission to take bolder steps, not only to electrify the baseline code, but to finally identify an end point at which the Title-24 code cycle updates no longer become cyclical, but will have reached a finite low-carbon building destination.

We look forward to helping Californians move towards more efficient, low-carbon buildings, using all-electric buildings as our baseline. We then can turn our attention to all the elements currently still missing from our buildings: rigorous air sealing, combined with thermal bridge-free assemblies and dedicated outdoor air systems that can provide healthy, comfortable indoor air during all seasons.

Thank you for your consideration of these comments.

Bronwyn Barry, RA, CPHD  
on behalf of Passive House California  
and the North American Passive House Network