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Regency Fireplace Products is Opposed to 2022 Energy Code That Ignores Fuel Options

I am a small business selling hearth products, especially heating gas fireplaces. Some of these products have replaced older woodburning products and, in some instances, my customers have received incentives from our local Air Quality Management Districts for putting in gas fireplaces.

I am aware that the California Energy Commission staff are finishing the next energy code, which would go into effect on January 1, 2023. I've also seen a number of letters in this docket urging you to mandate all electric homes in this next energy code.

I want to assure you that this is very premature. We need to continue to keep natural gas as a reliable energy option.

Other commenters are arguing that all-electric homes save money and are somehow cheaper. It's true that the cost of building the house is reduced, but certainly the electrical panel and the service hook up charge is greater. But my customers are legitimately concerned that the day-to-day cost of their homes will be higher. Without reliable and affordable battery storage, all-electric homes are not possible.

It is easy to imagine that electricity will be quite expensive in the evening and will vary in price a lot during the day. Natural gas, on the other hand, varies in price only a little, and seasonally, not daily.

I know that someday we will limit natural gas in new homes as part of our state's climate goals, but until there is a lot more electrical storage, and a much more reliable electricity network (all underground?), 2023 is WAY too early.

The 2022 Energy code need to continue to include options for dual fuel (electric and gas) homes.

Thank you for your consideration,

Sincerely,
Tonya Wofford

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