

DOCKETED

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*Comment Received From: Sarah Wiltfong
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BizFed Comments

Please see attached BizFed's comment letter regarding the CEC's recent workshop on indoor air quality.

If you have any questions, please contact Sarah Wiltfong at sarah.wiltfong@bizfed.org.

Additional submitted attachment is included below.

10/14/20

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

**Subject: Pre-Rulemaking for the California 2022 Energy Code Compliance Metrics,
Docket #19-BSTD-03**

Dear Commissioners,

We are contacting you on behalf of BizFed, the Los Angeles County Business Federation. We are an alliance of over 200 business associations who represent over 450,000 employers with 4 million employees in Los Angeles County. We appreciate the opportunity to comment on 2022 Energy Code Pre-Rulemaking – Title 24 Indoor Air Quality.

As the largest business advocacy organization in Southern California, BizFed represents a gamut of industries from large to small including health care, construction, housing, restaurants, warehouses, ports, transportation, refineries, fashion, production, tourism, lodging, aerospace, entertainment, sports, retailers and more. We are dependent on them and all of them are dependent on a steady, reliable, cost-effective flow of energy.

The business community is absolutely committed to helping the state achieve clean air goals and will work with the state to find solutions to each unique set of challenges regions and industry sectors have. However, we are concerned that the state is moving forward with narrow plans that do not include business input, is not technology neutral, and does not include proven data that supports claims. Policies made without these critical elements can lead to severe consequences – with little to none of the desired results. Proper ventilation will help resolve the concerns with indoor air quality related to cooking. Even with electric appliances the particulate emissions coming from cooking are still at play, we need to find ways to improve ventilation or make it easier to use instead of imposing costly regulations that will not fully resolve the issue.

Businesses and consumers alike have indicated clearly that they want energy choice. Whether it's the restaurant that needs natural gas stoves to perfect their craft, the manufacturer that needs energy from natural gas to produce, or the individual that cannot afford the running costs associated with all electric appliances. California is in a severe housing crisis and the need for affordable housing is on the rise. Taking away choices that could lead to economic instability is not a good strategy. The advocacy groups that claim natural gas use indoors has led to severe health impacts is completely unproven and before the CEC moves forward with anymore claims in this regard, a thorough discussion on data must be considered.

What's more, as with all regulatory items BizFed is engaged in, we are asking our lawmakers and regulators to consider the impacts of COVID-19 on all current and pending policies. Lifestyle and economic trends have changed drastically since the pandemic hit and indicators show that we will not be returning to pre-pandemic lifestyles anytime soon. Businesses have permanently closed, unemployment numbers are staggering, changes in consumer lifestyles and day-to-day behavior have shifted considerably. Policy decisions made previously will not work the same way when they were enacted. Updates to these policies reflecting the current economic status is imperative before the state moves forward with them.

In recent months the rolling blackouts brought a sobering reminder of what the business community has been saying for many years. The grid is at its peak and in order for California's trillion-dollar economy to remain steady and maintain the lifestyles of millions of

Californians – the state needs a diverse energy portfolio to ensure grid reliability. We cannot risk the health and lives of millions of Californians based on policies that seem to ignore this fact. Moving towards our green air goals can include the use of natural gas with science and creative ingenuity.

Governor Newsom recently signed legislation that expands the definition of biogas to include other forms of waste that can be converted to biofuel. Using our current infrastructure, just converting 20% of our natural gas system with renewable natural gas would result in more greenhouse gas reductions than electrifying all buildings. It is possible to move forward with our green air goals without limiting it to one form of technology and it's important that the state continue to move forward with an open mind.


In a state that contains the greatest minds in the world, BizFed remains optimistic, despite current circumstances, that we can reach our clean air goals and restore our economy. This takes a thorough process, keeping all sides at the table, and not precluding the end results.

Thank you for your consideration of our letter. If you have any questions, please contact sarah.wiltfong@bizfed.org.

Sincerely,



Sandy Sanchez
BizFed Chair
FivePoint



David Fleming
BizFed Founding Chair



Tracy Hernandez
BizFed Founding CEO
IMPOWER, Inc.

BizFed Association Members

7-Eleven Franchise Owners Association of Southern California
Action Apartment Association
Alhambra Chamber of Commerce
American Beverage Association
American Hotel & Lodging
American Institute of Architects - Los Angeles
Angeles Emerald
Apartment Association of Greater Los Angeles
Apartment Association, CA Southern Cities, Inc.
Arcadia Association of Realtors
AREAA North Los Angeles SFV SCV
Associated Builders & Contractors, Inc. Southern California Chapter
Association of Club Executives
Association of Independent Commercial Producers
Azusa Chamber of Commerce
Bell Gardens Chamber of Commerce
Beverly Hills Bar Association
Beverly Hills Chamber of Commerce
BNI4SUCCESS
Boyle Heights Chamber of Commerce
Building Industry Association - Baldyview
Building Industry Association - LA/Ventura Counties
Building Industry Association - Southern California
Building Owners & Managers Association of Greater Los Angeles
Burbank Association of REALTORS
Burbank Chamber of Commerce
Business and Industry Council for Emergency Planning and Preparedness
Business Resource Group
CA Natural Resources Producers Assoc
CAAsian Chamber
CaCFA
California Apartment Association- Los Angeles
California Asphalt Pavement Association
California Association of Food Banks
California Bankers Association
California Bus Association
California Business Properties Association
California Business Roundtable
California Cannabis Industry Association
California Cleaners Association
California Construction Industry and Materials Association
California Contract Cities Association
California Fashion Association
California Gaming Association
California Grocers Association
California Hispanic Chamber
California Hotel & Lodging Association
California Independent Oil Marketers Association (CIOMA)
California Independent Petroleum Association
California Life Sciences Association
California Manufacturers & Technology Association
California Metals Coalition
California Restaurant Association
California Retailers Association
California Small Business Alliance
California Society of CPAs - Los Angeles Chapter
California Sportfishing League
California Trucking Association
Californians for Balanced Energy Solutions
Carson Chamber of Commerce
Carson Dominguez Employers Alliance
CDC Small Business Finance
Central City Association
Century City Chamber of Commerce
Cerritos Regional Chamber of Commerce
Citrus Valley Association of Realtors
Commercial Industrial Council/Chamber of Commerce
Construction Industry Air Quality Coalition
Construction Industry Coalition on Water Quality
Council on Trade and Investment for Filipino Americans

Covina Chamber
Culver City Chamber of Commerce
Downey Chamber of Commerce
Downtown Center Business Improvement District
Downtown Long Beach Alliance
El Monte/South El Monte Chamber
El Segundo Chamber of Commerce
Employers Group
Engineering Contractor's Association
EXP
F.A.S.T.- Fixing Angelenos Stuck in Traffic FilmLA
Friends of Hollywood Central Park
Fur Information Council
FuturePorts
Gardena Valley Chamber
Gateway to LA
Glendale Association of Realtors
Glendale Chamber
Glendora Chamber
Greater Antelope Valley AOR
Greater Downey Association of REALTORS
Greater Lakewood Chamber of Commerce
Greater Los Angeles African American Chamber
Greater Los Angeles Association of REALTORS
Greater Los Angeles New Car Dealers Association
Harbor Association of Industry and Commerce
Harbor Trucking Association
Historic Core BID of Downtown Los Angeles
Hollywood Chamber
Hong Kong Trade Development Council
Hospital Association of Southern California
Hotel Association of Los Angeles
Huntington Park Area Chamber of Commerce
Independent Cities Association
Industry Business Council
Inglewood Airport Area Chamber of Commerce
Inland Empire Economic Partnership
International Warehouse Logistics Association
La Cañada Flintridge Chamber
LA County Medical Association
LA Fashion District BID
LA South Chamber of Commerce
Lancaster Chamber of Commerce
Larchmont Boulevard Association
Latino Food Industry Association
Latino Restaurant Association
LAX Coastal Area Chamber
League of California Cities
Long Beach Area Chamber
Los Angeles Area Chamber
Los Angeles County Board of Real Estate
Los Angeles County Waste Management Association
Los Angeles Gateway Chamber of Commerce
Los Angeles Gay & Lesbian Chamber of Commerce
Los Angeles Latino Chamber
Los Angeles Parking Association
Marketplace Industry Association
Motion Picture Association of America, Inc.
MoveLA
NAIOP Southern California Chapter
National Association of Royalty Owners
National Association of Tobacco Outlets
National Association of Women Business Owners
National Association of Women Business Owners - LA
National Hispanic Medical Association
National Latina Business Women's Association
Orange County Business Council
Pacific Merchant Shipping Association
Pacific Palisades Chamber
Panorama City Chamber of Commerce
Paramount Chamber of Commerce
Pasadena Chamber

Pasadena Foothills Association of Realtors
PhRMA
Planned Parenthood Affiliates of California
Pomona Chamber
Propel LA
Rancho Southeast Association of Realtors
ReadyNation California
Recording Industry Association of America
Regional Black Chamber-San Fernando Valley
Regional Hispanic Chamber of Commerce
Regional San Gabriel Valley Chamber
Rosemead Chamber
San Dimas Chamber of Commerce
San Gabriel Chamber of Commerce
San Gabriel Valley Economic Partnership
San Pedro Peninsula Chamber
Santa Clarita Valley Chamber
Santa Clarita Valley Economic Development Corp.
Santa Monica Chamber of Commerce
Sherman Oaks Chamber
South Bay Association of Chambers
South Bay Association of Realtors
South Gate Chamber of Commerce
Southern California Contractors Association
Southern California Golf Association
Southern California Grantmakers
Southern California Leadership Council
Southern California Minority Suppliers Development Council Inc.
Southern California Water Coalition
Southland Regional Association of Realtors
Sunland/Tujunga Chamber
The Young Professional at the Petroleum Club
Torrance Area Chamber
Town Hall Los Angeles
Tri-Counties Association of Realtors
United Cannabis Business Association
United Chambers - San Fernando Valley & Region
United States-Mexico Chamber
Unmanned Autonomous Vehicle Systems Association
US Green Building Council
US Resiliency Council
Valley Economic Alliance, The
Valley Industry & Commerce Association
Vernon Chamber
Vietnamese American Chamber
Warner Center Association
West Hollywood Chamber
West Los Angeles Chamber
West San Gabriel Valley Association of Realtors
West Valley/Warner Center Chamber
Western Manufactured Housing Association
Western States Petroleum Association
Westside Council of Chambers
Westwood Community Council
Westwood Village Rotary Club
Whittier Chamber of Commerce
Wilmington Chamber
World Trade Center
Young Professionals in Energy - LA Chapter