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Proposed 2022 Energy Code on Electrification

We urge staff to set strong decarbonization requirements by tightening the gas baseline, in order to lead to broad adoption of all-electric new construction. Please see attached letter.

Additional submitted attachment is included below.



October 16, 2020

California Energy Commission
Docket Office, MS-4
Re: Docket No. 19-BSTD-03
1516 Ninth Street
Sacramento, CA 95814
docket@energy.ca.gov

Re: Staff Workshop: 2022 Energy Code Pre-Rulemaking – Proposed 2022 Energy Code on Electrification

Dear Commissioners:

On behalf of Guttman & Blaevoet, we thank you for the opportunity to comment on the California Energy Commission's (CEC) proposed 2022 Building Energy Efficiency Standards (Energy Code) on Electrification. We appreciate the CEC's efforts to encourage the use of heat pumps, and we support the proposal's use of compliance incentives for all-electric buildings. However, the proposal is insufficient to shift the market to electric new construction. **We urge staff to set strong decarbonization requirements by tightening the gas baseline, in order to lead to broad adoption of all-electric new construction.**

In early 2019, the Building Decarbonization Coalition published a roadmap laying out the key activities required to efficiently, equitably, and affordably electrify the building sector.¹ The roadmap emphasizes that any new building construction between now and 2045 that relies on fossil fuels for space and water heating represents incremental emissions, deepening the challenge of decarbonizing the sector.

Building all-electric is cheaper, faster, and cleaner: cheaper because it avoids gas plumbing in the building and the gas infrastructure; faster because it avoids waiting for the utility to connect the building which can take months and is one of the major delays in new construction; cleaner because electric appliances eliminate nitrogen oxides, particulate matter, and climate pollution from gas combustion.

¹ [A Roadmap to Decarbonize California's Buildings](#). Building Decarbonization Coalition (2019).

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The code the Energy Commission adopts this year will apply to buildings constructed between 2024 and 2026. We cannot wait another three years to update the Energy Code and allow building with gas until 2029. According to Rocky Mountain Institute (RMI), delaying the code update until the next cycle would result in an additional three million tons of carbon emissions by 2030 – the equivalent of putting 650,000 more cars on the road for a year.²

35 California cities and counties have already adopted electrification reach codes beyond the state minimum requirements for energy use in building design and construction, with these local governments now leading the way on clean air, climate solutions, and the renewable energy economy. As California grapples with a climate crisis, the CEC must take the lead and set the building industry (i.e. manufacturers, architects, real estate agents, builders and contractors) on a clear path towards all-electric construction.

For California to meet its housing, health, and climate goals, homes and buildings must use clean energy. Newly constructed buildings will be in use for decades and continuing to connect new buildings to gas makes it much harder and costlier to convert them to clean electricity later. Therefore, we urge the CEC to set strong decarbonization requirements in this code update. We look forward to collaborating with the CEC and other interested stakeholders ahead of the next workshop.

Sincerely,



Steven Guttman, P.E., BCxP, LEED Fellow
Principal

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² [California Can't Wait on All-Electric New Building Code](#). Rocky Mountain Institute (2020).