

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	235303
Document Title:	Abby Young Comments - BAAQMD Comment Letter
Description:	N/A
Filer:	System
Organization:	Abby Young
Submitter Role:	Public Agency
Submission Date:	10/19/2020 11:00:08 AM
Docketed Date:	10/19/2020

*Comment Received From: Abby Young
Submitted On: 10/19/2020
Docket Number: 19-BSTD-03*

BAAQMD Comment Letter

Additional submitted attachment is included below.



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

October 19, 2020

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

ALAMEDA COUNTY
John J. Bauters
Pauline Russo Cutter
Scott Haggerty
Nate Miley

CONTRA COSTA COUNTY
John Gioia
David Hudson
Karen Mitchoff
(Secretary)
Mark Ross

MARIN COUNTY
Katie Rice

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
VACANT
Shamann Walton
Tyrone Jue
(SF Mayor's Appointee)

SAN MATEO COUNTY
David J. Canepa
Carole Groom
Davina Hurt

SANTA CLARA COUNTY
Margaret Abe-Koga
Cindy Chavez
(Vice Chair)
Liz Kniss
Rod G. Sinks
(Chair)

SOLANO COUNTY
James Sperring
Lori Wilson

SONOMA COUNTY
Teresa Barrett
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:



RE: All-Electric Buildings for the 2022 Building Energy Efficiency Standards Update

Dear Commissioners:

The Bay Area Air Quality Management District (Air District) is writing to express support for an all-electric baseline in the California Energy Commission's (CEC) 2022 Building Energy Efficiency Standards (Energy Code).

The Air District appreciates the CEC's efforts to encourage the use of heat pumps, however, the current proposal is insufficient to shift the market to all-electric new construction at the speed and scale needed to address the climate crisis. The Air District urges the CEC to set strong decarbonization requirements by requiring all-electric new construction.

The next Energy Code the CEC adopts will apply to buildings constructed between 2024 and 2026. These buildings will continue to extend the natural gas infrastructure and support use of natural gas well beyond the State's target years for carbon neutrality (2045) and for achieving an 80% reduction in greenhouse gas emissions (2050).

In the absence of State leadership on this issue, it has been left to local governments to develop and adopt their own electrification reach codes – as 35 jurisdictions throughout the State already have. The Bay Area is home to over 100 cities, most of them small and many of them under-resourced. Local governments do not have the staff resources or expertise to research and develop their own local reach codes, so they look to the State for leadership. A 2022 State Energy Code that includes an all-electric baseline would relieve local governments of this burden, allowing them to focus their resources on other critical issues.

An all-electric 2022 Energy Code would also improve air quality and health outcomes for the residents of California. In addition to carbon dioxide and methane, leakage and combustion of natural gas in buildings releases toxic air contaminants, nitrogen oxides, carbon monoxide and particulate matter, creating indoor and outdoor pollution that significantly harms air quality and public health.

The Air District enthusiastically encourages the CEC's development of an all-electric 2022 Energy Code and looks forward to collaborations in our shared pursuit of a healthy, equitable and carbon-free California. For further information on the Air District's Building Decarbonization Program, please contact Advanced Projects Advisor Jakub Zielkiewicz, at jzielkiewicz@baaqmd.gov.

Sincerely,

A handwritten signature in black ink that reads "Jack P. Broadbent". The signature is written in a cursive style with a large initial "J" and a distinct "P".

Jack P. Broadbent
Executive Director/APCO

Cc: Board of Directors, BAAQMD