

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

19-BSTD-03 2022 Energy Code Pre-Rulemaking

Additional submitted attachment is included below.

October 19, 2020

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Comments on Docket No. 2019-BSTD-03 (2022 Energy Code)

Dear Commissioners:

Thank you for the opportunity to comment on the California Energy Commission's (CEC) proposed 2022 Building Energy Efficiency Standards (Energy Code) on Electrification. I urge you to act now to put in place strong mandates for building electrification.

I served as Chair of the Mayors' Commission on Climate Change (MCCC) for Sacramento and West Sacramento. The MCCC completed its work in June 2020, and submitted a set of high-level recommendations on achieving Carbon Zero by 2045 in the two cities ([MCCC Report](#)). The report was adopted unanimously by the 19-member body, which consisted of representatives and community leaders from government, business, environmental and other advocacy groups, and academia.

The MCCC identified Building Electrification as a top priority, and made the following applicable recommendation:

Electrification of New Construction

Mandate all-electric construction to eliminate fossil-fuel use in new low-rise* buildings by 2023 and all buildings by 2026**

**Low-rise defined as under 4 stories.*

***Provided that the costs to go all-electric are cost effective including the incremental costs of electrical infrastructure upgrades and the technology has been shown to be feasible.*

As California grapples with a climate crisis, the CEC must take the lead and set a clear path towards all electric building construction. Studies have shown that building electrification can reduce the cost of constructing new homes, lower energy bills, create local jobs, improve air quality, and put downward pressure on electricity rates. Furthermore, all-electric buildings will undoubtedly improve overall indoor air quality and health-related issues by eliminating natural gas combustion inside homes.

The City of Sacramento has responded quickly to the MCCC report and is already working on a proposed ordinance to implement the electrification recommendation, with a tentative completion date of March 2021. In doing so, Sacramento is joining over 30 other California cities and counties that have already adopted electrification reach codes beyond the state minimum requirements.

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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. Action by the CEC to set strong electrification requirements in this code update would support the MCCC recommendations and set a clear standard for cities and counties throughout the state.

Thank you for your consideration.

Sincerely,

Anne Stausboll

