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*Comment Received From: Christopher Noll, FAIA
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Comments for Critical CEC T24 2022 Hearing

Please see attached letter.

Additional submitted attachment is included below.

October 19, 2020

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: 2022 Energy Code Pre-Rulemaking

Dear California Energy Commission:

Noll & Tam Architects would like to voice our comments and concerns on the drafting of new CEC 2022 Title 24 Standards. As a firm, Noll & Tam Architects is aware of the everchanging state of today's global climate due to human activities. We feel it is imperative that our energy codes need a stronger approach to climate change to prevent an irreversible, even catastrophic process that would result if we do not dramatically change how we design and build.

As both Architects and concerned citizens, Noll & Tam believes it is time to stop burning fossil fuels inside our buildings and shift to all electric buildings (with the exception only for specialty functions). We have done this before for many recent projects including the Hayward Library & Community Learning Center and the Half Moon Bay Library both of which are LEED Platinum and Zero Net Energy with an all-electric design. Our El Cerrito Recycling Center project received LEED Platinum and Zero Net Energy Certifications with an all-electric design again, where we were able to build a living model of environmental regeneration easily and inexpensively through a competitive design-build process.

We are seeing a strong trend toward all-electric in our new buildings and find that the systems and building designs are generally simpler and less expensive when they are all-electric. Knowing that buildings contribute approximately 40% of the world's carbon emissions, we highly support a mandate for electric systems that reduce carbon emissions for the same result. We also strongly support the CEC's expansion of rooftop solar to more building types.

We are not of the opinion that including gas or other carbon fuels in buildings is necessary, more efficient, less expensive, or better. All-electric design is totally feasible and achievable now, and there is no rational, public-minded argument that would say otherwise.

In our considerable professional experience, going all-electric on buildings is highly feasible, cost-effective and will allow us to meet our carbon neutral goals by 2045, or sooner we hope. Noll & Tam Architects believes that the all-electric effort and investment will yield many important benefits.

Sincerely,



Christopher Noll, FAIA

Principal/Owner