

DOCKETED

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Bay Area Regional Collaborative Comments on 2022 Building Code

Additional submitted attachment is included below.



October 20, 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 the Bay Area Regional Collaborative (BARC), 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. The Bay Area Regional Collaborative (BARC) is a consortium of regional government agencies in the nine-county Bay Area that work together to address the integrated issues of climate change, equity, air quality, land use, and transportation. BARC's membership consists of the Bay Area Air Quality Management District (BAAQMD), the Metropolitan Transportation Commission (MTC), the Association of Bay Area Governments (ABAG) and the San Francisco Bay Conservation and Development Commission (BCDC), in addition to three non-voting members: the State Coastal Conservancy, Caltrans District 4, and the San Francisco Bay Regional Water Quality Control Board.

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.

Today, Bay Area residents are grappling with a set of overlapping climate impacts of unprecedented intensity. Over the past two months, we have experienced the world's worst air quality from record-breaking wildfires combined with the escalating effects of extreme heat waves and rising sea levels. Our region's historic housing affordability crisis, in tandem with the Covid-19 pandemic, only increases the danger that climate impacts pose to our region's most socioeconomically vulnerable people.

In Bay Area cities, buildings are typically the second-largest contributor of greenhouse gases behind transportation, primarily through the combustion of natural gas for heating and cooking. Indoor air pollution from natural gas appliances is also increasingly being linked to respiratory illnesses, heart disease, and premature death.¹

Over the past 15 months, cities from across the Bay Area have enacted first-of-their-kind measures to prohibit natural gas in most new construction and lay the groundwork for all-electric buildings. In total, 35 California cities and counties have already adopted electrification reach codes beyond the state minimum requirements for energy use in building design and construction. However, given the direness of the climate impacts that we are now facing year in and year out, we cannot rely on patchwork efforts to move us towards our goal of carbon neutrality by 2045. The State must leverage the current building code cycle to put us on track towards deep decarbonization of the buildings sector as soon as possible.

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.² 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.

The code the Energy Commission adopts this year will apply to buildings constructed between 2024 and 2026. By waiting an additional three years, we will allow new gas infrastructure to be built 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.³

As we grapple with another record-breaking year of climate change impacts across the state, including wildfires unprecedented in size and rising sea levels, 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

¹ [Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California](#). UCLA Fielding School of Public Health (2020).

² [A Roadmap to Decarbonize California's Buildings](#). Building Decarbonization Coalition (2019).

³ [California Can't Wait on All-Electric New Building Code](#). Rocky Mountain Institute (2020).

update. We look forward to collaborating with the CEC and other interested stakeholders ahead of the next workshop.

Sincerely,

A handwritten signature in black ink, appearing to read "Allison Brooks". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Allison Brooks
Executive Director
Bay Area Regional Collaborative