

DOCKETED

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Leaders for Livable Communities

October 19, 2020

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Executive Director
Kate Meis

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 Local Government Commission, 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.**

[Local Government Commission \(LGC\)](#), a California-based 501(c)3 nonprofit organization, has been working in partnership with and on behalf of local governments throughout California to create livable communities for nearly 40 years. LGC brings local governments and community stakeholders together to advance transformative energy policies and in recent years, building electrification has become a top priority for many communities. This includes our recent work with the [Mayors' Commission on Climate Change](#), a joint initiative of Sacramento Mayor Steinberg and West Sacramento Mayor Cabaldon to identify priority strategies to achieve carbon neutrality by 2045. Adopting an ordinance to mandate all-electric new construction was among the urgent set of actions unanimously adopted by the Commission to not only support the cities' carbon neutral goal, but to deliver critical public health benefits and support economic recovery.

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 often 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.

The code the CEC 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



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gas until 2029. According to Rocky Mountain Institute, 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.¹

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,

Kate Meis
Executive Director
Local Government Commission

¹ [California Can't Wait on All-Electric New Building Code](#). Rocky Mountain Institute (2020).