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<b>Project Title:</b>	2022 Energy Code Pre-Rulemaking
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<b>Document Title:</b>	Berkeley Councilmember Kate Harrison Comments - Berkeley Councilmember Kate Harrison - All-Electric Code and Legislation Empowering CEC to Prohibit New Gas Infrastructure
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*Comment Received From: Berkeley Councilmember Kate Harrison  
Submitted On: 10/29/2020  
Docket Number: 19-BSTD-03*

**Berkeley Councilmember Kate Harrison - All-Electric Code and  
Legislation Empowering CEC to Prohibit New Gas Infrastructure**

*Additional submitted attachment is included below.*



Kate Harrison  
Councilmember, District 4

October 29, 2020

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

Dear Honorable Commissioners:

I am writing as a Berkeley City Councilmember to strongly urge the California Energy Commission to adopt a building code that is aligned with the state's climate targets by halting further expansion of gas infrastructure, **including adopting an all-electric building code for both residential and commercial buildings** to utilize the state's increasingly carbon-free electricity resources in 2022, and **recommending to the State Legislature and Governor to adopt legislation empowering the CEC to prohibit gas infrastructure in newly constructed buildings** as soon as possible.

Californian cities are already leading the way towards a decarbonized building sector. As you are aware, I recently introduced and help pass the first ordinance in the nation prohibiting natural gas in new construction. So far, dozens of communities have adopted reach codes and local ordinances that prioritize or require all-electric new construction.

California has adopted aggressive greenhouse gas (GHG) emission reduction targets in the existing building stock, including 40% below 1990 by 2030, and carbon neutrality by 2045. For California to meet its climate goals, the state must also address the significant statewide GHG emissions that come from California buildings using natural gas. If we are serious about meeting these targets, we simply cannot afford to continue siting expensive and deadly new gas infrastructure that will inevitably require conversion; rather our effort locally and statewide should be focused on retrofitting existing buildings.

I strongly support the CEC adopting enhanced regulations such as an all-electric baseline and metrics that more effectively consider the health, safety, economic, equity,

and climate impacts of the greenhouse-gas emissions arising from natural gas infrastructure in the 2022 code. However, to the extent that the CEC lacks the authority to wholly prohibit new natural gas infrastructure, I urge you to expeditiously present recommendations to the State Legislature and Governor to amend the Warren-Alquist Act and related statutes and codes in order to facilitate a rapid statewide halt to new gas infrastructure.

The January 1, 2021 requirement under Assembly Bill 3232 (2018) for the CEC to “assess the potential for the state to reduce the emissions of greenhouse gases in the state’s residential and commercial building stock by at least 40 percent below 1990 levels by January 1, 2030” represents the perfect opportunity to urgently convey to the state lawmakers that the time for a statewide gas prohibition is now.

I urge the CEC to move as quickly as possible and adopt an all-electric code in 2022 and to work with state lawmakers to prohibit natural gas infrastructure as soon as possible, and look forward to collaborating with the CEC and other interested stakeholders on decarbonizing our state’s building stock.

Sincerely,

A handwritten signature in black ink that reads "Kate Harrison". The signature is written in a cursive, flowing style.

Kate Harrison  
Berkeley City Council, District 4