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Re Staff Workshop 2022 Energy Code Pre-Rulemaking “ December 8 Workshop Proposed 2022 Energy Code

California’s 2045 carbon neutrality goal requires the state to be forward-thinking and prepare for a carbon-free economy. Title 24 needs to be brought up to date to phase out gas in favor of all-electric buildings. This needs to include a heat pump baseline for large non-residential building types that typically rely on residential central boilers for space heating. Also, since the majority of pollution will come from existing buildings, any replacement of gas heaters by more gas heaters will threaten our 2045 goal. Scaling back GHG gases is no less than a life and death proposition to our planet. Make replacement of gas heaters by heat pump heaters mandatory for all buildings and residences in a phased replacement plan to be sequenced by California's 2045 GHG target.