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*Comment Received From: AIA California  
Submitted On: 12/23/2020  
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**AIA California Comments on 19-BTSD-03**

*Additional submitted attachment is included below.*



December 23, 2020

California Energy Commission  
Dockets Office, MS-4  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814

**Re: Docket No. 19-BTSD-03**

The American Institute of Architects California (AIA CA) is the voice of the architectural profession in California. Our 11,000 architect and allied professional members design virtually all commercial, institutional and high density residential and mixed use projects in our state, and our members are among the thought leaders for every building type. Like the national American Institute of Architects, AIA CA has made climate action a key focus that runs through all our efforts.

We agree that the design of building projects - both new and retrofit - is critical to success in addressing climate change, and in that light we support strengthening electrification for buildings in the 2022 update of the Energy Code in a number of key areas.

**Residential heat pumps are a mature technology and widely available:** Heat pumps are already the most common form of space heating in new residential construction in the U.S. with over 40% market share compared to only 35% for gas heating. In California heat pumps are around 8% of new residential construction per the 2019 Residential Appliance Saturation Survey. The percentage of homes with heat pumps will be increasing rapidly due to the 40 cities that have already passed electric reach codes, representing over 12% of the population. Combined these rates point to a market saturation rate of almost 20% in 2021. In addition, the AIA CA is working with many additional jurisdictions in central and southern California which we expect to pass electrification codes next year so we anticipate the market to be even larger when the 2022 energy code takes effect. In addition, over 90% of homes have AC which are almost identical in installation as heat pumps, so we believe there is not a significant skill or knowledge barrier for builders.

**Provide a level playing field for large non-residential buildings:** Current proposals for the 2022 Energy Code do not include an electric baseline for large buildings which will penalize these projects and discourage them from an all-electric approach with much lower GHG emissions. We believe the CEC should provide a way for these projects to use the performance path in order to avoid undermining the architects, clients, and cities that are committed to doing so. The AIA CA applauds the CEC's proposed single electric baseline for some project types, and support expanding that to include more project types. Many of California's schools and universities rely on significant public funding over long time frames and should pursue electrification now rather than having to spend additional tax payer dollars for a decarbonization retrofit in the near future.

The American Institute of Architects

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**Electric Ready:** To achieve California's legislated low carbon future almost all of California's buildings will need to be electrified. This is much more cost effective at the time of construction than as a retrofit of a completed building full of occupants which is extremely disruptive. All new buildings could easily and at very low cost pre-wire any appliance where they chose to use gas to enable future electrification without overly burdensome costs. These electric-ready requirements should include the wiring to the correct locations and the appropriate space for the future equipment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Debra Gerod', with a stylized, cursive flourish.

Debra Gerod, FAIA  
2020 AIA CA President