

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	236510
Document Title:	Comments from Sue Y Lee Mossman - 2022 Energy Code Pre-Rulemaking
Description:	N/A
Filer:	Chester Hong
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	1/28/2021 2:24:40 PM
Docketed Date:	1/28/2021

From: [McAllister, Lana@Energy](mailto:McAllister,Lana@Energy) on behalf of [Energy - Mediaoffice](#)
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Date: Thursday, January 28, 2021 2:12:54 PM

Please docket this comment.

Thank you.

Lana

Media office

From: syl1@humboldt.edu <syl1@humboldt.edu> on behalf of sue <syl1@humboldt.edu>
Sent: Thursday, January 28, 2021 12:24 PM
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Submitted by: Anonymous

Submitted values are:

Information About You (optional)

First Name

sue

Last Name

mossman

Email

syl1@humboldt.edu

Phone

[7076773669](tel:7076773669)

Address

PO Box 223

Arcata, California. 95518

Comments or Concerns

comments

Re: Docket #: 19-BSTD-03 Project Title: 2022 Energy Code Pre-Rulemaking

I urge the CEC to adopt a single, all-electric baseline for all building types as soon as possible. All-electric buildings are cheaper to build and operate, better for public health, and critical to protect us from the climate crisis.

We all know that we need to move swiftly to reduce carbon emissions. We simply dig ourselves a deeper hole if we continue developing new buildings that use natural gas. Those buildings will eventually require expensive retrofits to become carbon neutral. Economically it makes much more sense to get it done right the first time by electrifying new buildings' cooking, space, and water heating systems.

As you know many cities and counties across the state are developing all-electric REACH codes or natural gas bans. The city of Arcata has worked to develop an ordinance. One thing that I've learned as I've watched their progress is that there are many different ways these ordinances seek to encourage electrification. That alone can be confusing to the public, and to builders, who are faced with a statewide patchwork of differing codes regarding electrification, which is a concept new to many builders.

This also invites opposition as these are often fairly small jurisdictions and often surrounded by communities that aren't seeking a goal of building electrification. It's often a tough sell to move these ordinances through. Action by the CEC for a statewide standard code would make the path forward much easier by establishing a statewide code which will, over time, become accepted, rather than opposed, by builders.

Another thing that we've learned in Arcata was through an analysis the city commissioned that showed that the greatest cost saving came from setting the standard for all-electric NOW, rather than make buildings electric-ready but with gas as an option for now. Placing the gas infrastructure alone adds a lot of money to construction costs. I don't think it's wise for the CEC to set a standard that has the potential to raise building costs any more than absolutely necessary.

Sue Y. Lee Mossman
PO Box 223
Arcata, CA 95518