

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	236643
Document Title:	BAAQMD Comment Letter
Description:	N/A
Filer:	System
Organization:	Bay Area Air Quality Management District
Submitter Role:	Public
Submission Date:	2/4/2021 6:41:17 PM
Docketed Date:	2/4/2021

*Comment Received From: Bay Area Air Quality Management District
Submitted On: 2/4/2021
Docket Number: 19-BSTD-03*

BAAQMD Comment Letter

Additional submitted attachment is included below.



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Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:



February 4, 2021

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

RE: All-Electric Buildings for the 2022 Building Energy Efficiency Standards Update

Dear Commissioners:

The Bay Area Air Quality Management District (Air District) is writing to reiterate our support for the California Energy Commission (CEC) to move toward adopting a single, all-electric baseline for all building types in the 2022 Building Energy Efficiency Standards (Energy Code).

The Air District appreciates the efforts of the CEC's 2022 Title 24 Standards Building Decarbonization Team in developing proposed measures for the 2022 Energy Code update that address greenhouse gas (GHG) emissions and move the building sector toward decarbonization. The draft measures presented at the January 26 workshop indicate that the baseline for the 2022 Energy Code would require one all-electric appliance for low-rise residential buildings, depending on climate zone, and require that all buildings be all-electric ready. While this is an important step toward achieving California's decarbonization goals, it would still allow for the installation of natural gas appliances in homes. Continuing to allow natural gas combustion in new construction will impede progress in reducing GHGs and air pollutant emissions in the building sector in the Bay Area.

To date, thirty-eight local governments in the Bay Area have adopted policies to limit or outright ban natural gas use in new buildings, creating a regional patchwork of policies and requirements for new construction. A consistent, statewide approach to decarbonizing buildings would create clear market signals to appliance manufacturers, developers and builders, and would relieve local governments from allocating limited staff resources to developing their own policies. Waiting until 2025 for the next opportunity to fully decarbonize new construction will cost California three million tons in additional carbon emissions by 2030, make it more challenging for local governments to meet their climate protection goals, and delay air quality and health benefits of reduced natural gas combustion emissions in the building sector.

The Air District is developing a regulatory approach to further reduce nitrogen oxides (NOx) emissions from indoor natural gas appliances. In November 2020, the California Air Resources Board (CARB) unanimously adopted a resolution committing to significant action to limit emissions from natural gas appliances in buildings (Res. 20-32). There is a wave of public policy emerging to advance building decarbonization throughout the State, providing a critical opportunity for collaboration across agencies.

What is done in California sets the tone for the rest of the country. The Air District looks forward to collaborating with the CEC to put California on an accelerated path to deep decarbonization. For further information on the Air District's Building Decarbonization Program, please contact Climate Protection Manager Abby Young at ayoung@baaqmd.gov.

Sincerely,

A handwritten signature in black ink that reads "Jack P. Broadbent". The signature is written in a cursive, flowing style.

Jack P. Broadbent, Executive Director/APCO

Cc: Board of Directors, BAAQMD