

**DOCKETED**

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## **2022 Energy Code Pre-Rulemaking**

*Additional submitted attachment is included below.*

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Re: Docket No. 19-BSTD-03, 2022 Energy Code Pre-Rulemaking

Dear Mr. Shirakh:

I am writing on behalf of the California State Pipe Trades Council regarding the proposed residential 2022 California Energy Code amendments presented at the January 26, 2021 Staff Workshop on Decarbonization. At the workshop, staff presented proposals to change the Energy Code baseline that would require low-rise residential buildings to include either an all-electric heat pump water heater or an all-electric heat pump space heater system, depending on climate zone, and require that all residential buildings be pre-wired as all-electric ready. We understand that the Energy Commission is also considering similar proposals for high-rise residential and commercial buildings.

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The California State Pipe Trades Council opposes these proposed amendments because they effectively impose all-electric construction requirements before a statewide plan for a fair, safe, and equitable transition to building decarbonization can be completed. While packaged as a limited, incremental step toward electrification, the requirements will effectively create an all-electric requirement for most new construction by making dual fuel construction significantly more expensive.

Decarbonization requires an integrated and coordinated statewide approach in order to avoid unintended impacts on safety, rates, infrastructure, grid-reliability, equity, and workers. The recent Gridworks Report Phase I report provides a detailed analysis of the problem with an uncoordinated transition away from natural gas.<sup>1</sup> While there is consensus that natural gas usage must be reduced to meet GHG goals, it is already being reduced in a manner that will impose great cost burdens on those who cannot afford it and on workers whose livelihoods will be impacted by this transition.

The California State Pipe Trades Council understands that many members of the environmental community are impatient to adopt all-electric construction requirements as an immediate step toward decarbonization. But it cannot be ignored that such an action would create immediate significant job losses for plumbers and other blue-collar workers who currently make a living installing gas piping and appliances in buildings. An action with such significant job loss impacts should not be rushed through without ensuring that these job losses will be minimized or mitigated. Where entire job sectors are being eliminated or phased out, we need to ensure that there are no other alternative paths for reducing greenhouse gas emissions that could be taken to minimize those impacts. Where jobs are eliminated, *concurrent actions* need to be taken to provide a true, just transition to those whose livelihoods are directly impacted.

Currently, a statewide plan for decarbonization is being developed through a CPUC proceeding (rulemaking (R.20-01-007) to identify solutions to concerns regarding an uncoordinated approach to decarbonization. The solutions being discussed include a variety of paths including the use of renewable gas (biomethane, hydrogen). In addition, the California State Pipe Trades Council has engaged in discussions with NRDC, Sierra Club and others regarding how workforce impacts

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<sup>1</sup> [https://gridworks.org/wp-content/uploads/2019/09/CA\\_Gas\\_System\\_in\\_Transition.pdf](https://gridworks.org/wp-content/uploads/2019/09/CA_Gas_System_in_Transition.pdf).

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could be addressed. The California State Pipe Trades Council opposes the adoption of statewide electrification requirements prior to the completion of a coordinated and equitable statewide plan for building decarbonization that takes into account impacts on workers.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads "Thomas A. Enslow". The signature is written in a cursive style with a long horizontal line extending to the right.

Thomas A. Enslow

TAE:ljl