DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	236796
Document Title:	Kim F Floyd Comments - CEC Proposed Title 24 Not Good Enough
Description:	N/A
Filer:	System
Organization:	Kim F Floyd
Submitter Role:	Public
Submission Date:	2/14/2021 9:26:55 PM
Docketed Date:	2/16/2021

Comment Received From: Kim F Floyd

Submitted On: 2/14/2021 Docket Number: 19-BSTD-03

## **CEC Proposed Title 24 Not Good Enough**

The California Energy Commission (CEC)'s latest proposal for energy efficiency will slow California's ability to cut climate and air pollution.

The statewide Title 24 building code sets a minimum energy efficiency standard for new residential and commercial construction. The code helps determine whether new homes will be built to run on clean electricity or remain dependent on dirty fossil fuels. The CEC updates the code every three years, and the most recent update is nearing completion.

Well over 100 organizations, ranging from environmental to public health groups, utilities, air districts, and local governments, have testified at workshops and submitted comments to the CEC, urging the adoption of an all-electric code to get the gas out of new buildings. An all-electric standard will reduce climate emissions and air pollution, benefit public health, and reduce the costs to build and operate new buildings, including new homes.

Yet, even with this knowledge of the benefits of building electrification, the CEC proposed update falls wildly short of what California needs to make an impact.

The CEC's current proposal only requires electrification of a single electric appliance with an important caveat. Either an electric heat pump water heater or an electric heat pump space heater will be used in the new standard. But, and even more disheartening, which of these appliances will be electric will be dependent on where the building is located and the proposal opts for the appliance that would use the least energy in a given climate zone.

To put into context, for new construction based in San Diego, the code would use a heat pump space heater for the new code standard instead of a heat pump water heater. A typical home in San Diego burns between 4 to 5 times more gas for water heating than space heating. Hence, the San Diego home could still be built with polluting gas dominating the fueling for appliances.

The building code update fails to comply with existing research that shows that California must electrify the building sector to sufficiently cut greenhouse gas emissions. The CEC proposal will set California on a path that will end up costing Californians more in the future as air pollution and climate pollution increase.

The CEC has five commissioners who must vote on the Title 24 proposal when it is finalized and brought to a vote sometime this summer. Governor Newsom can intervene in the meantime and tell the CEC to do better with its proposal.

You can help by writing to both the Governor and the CEC urging them to rise to this moment, demonstrate climate leadership, and commit to an all-electric standard in the 2022 code.