

**DOCKETED**

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<b>Project Title:</b>	2022 Energy Code Update Rulemaking
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<b>Document Title:</b>	CARB Comments - 45-Day Express Terms for 2022 Energy Code
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*Comment Received From: Dana Papke Waters*  
*Submitted On: 6/18/2021*  
*Docket Number: 21-BSTD-01*

**CARB Comments - 45-Day Express Terms for 2022 Energy Code**

*Additional submitted attachment is included below.*

June 18, 2021

Andrew McAllister, Commissioner  
California Energy Commission  
1516 Ninth Street, MS 33  
Sacramento, California 95814

Dear Commissioner McAllister:

Thank you for your leadership to prioritize building decarbonization in the 2022 update to the California Building Energy Efficiency Standards (Energy Code), Part 6 of Title 24 building standards. CEC's proposal to include heat pumps in the standard design (baseline) for residential and selected nonresidential buildings has the potential to reduce up to 40 percent of natural gas use in buildings. CEC's proposed mandatory requirements for Electric Ready buildings can help to facilitate future installation of electric appliances.

These proposed code changes lay a solid foundation as we transition to a zero-emission future. To that end, CARB would like to work with CEC to further advance mandatory building electrification standards in Title 24 as soon as possible. Accelerating building electrification in the near-term is essential to put us on track to achieve both our SB 32 2030 target of 40% below 1990 levels and our mid-century climate neutrality target. By 2050, an estimated 30-50 percent of California's building stock will be constructed based on building standards effective in 2023. Transitioning away from fossil fuels in buildings reduces statewide greenhouse gas (GHG) emissions and provides important air quality and health benefits. If all residential gas appliances were immediately replaced with clean electric alternatives, the reduction of outdoor NO<sub>x</sub> and PM<sub>2.5</sub> could reduce over 900 bronchitis cases and save several hundreds of lives equivalent to approximately \$3.5 billion in avoided health care costs annually<sup>1</sup>.

Thank you for your leadership and ongoing collaboration as our two agencies work towards reducing reliance on fossil fuels in buildings and achieving California's climate change and air quality goals. For questions or for more information, please contact Jennifer Gress, Chief of the Sustainable Transportation and Communities Division, at [Jennifer.Gress@arb.ca.gov](mailto:Jennifer.Gress@arb.ca.gov).

Sincerely,



Richard W. Corey, Executive Officer

cc: See next page.

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<sup>1</sup> Zhu, Y. Connolly, R., Lin, Y., Mathews, T., and Wang, Z. (2020). Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California. Retrieved from <https://ucla.app.box.com/s/xyzt8jc1ixnetiv0269qe704wu0ihif7>

cc: California Energy Commission  
Docket Unity, MS\*4  
Docket No. 21 BSTD-01  
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