

DOCKETED

| | |
|-------------------------|---|
| Docket Number: | 21-BSTD-01 |
| Project Title: | 2022 Energy Code Update Rulemaking |
| TN #: | 238338 |
| Document Title: | California State Pipe Trades Council Comments - 2022 Energy Code Rulemaking |
| Description: | N/A |
| Filer: | System |
| Organization: | California State Pipe Trades Council |
| Submitter Role: | Public |
| Submission Date: | 6/21/2021 2:04:13 PM |
| Docketed Date: | 6/21/2021 |

*Comment Received From: California State Pipe Trades Council
Submitted On: 6/21/2021
Docket Number: 21-BSTD-01*

2022 Energy Code Rulemaking

Additional submitted attachment is included below.

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

520 CAPITOL MALL, SUITE 350
SACRAMENTO, CA 95814-4721

TEL: (916) 444-6201
FAX: (916) 444-6209

kjones@adamsbroadwell.com

SO. SAN FRANCISCO OFFICE

601 GATEWAY BLVD., SUITE 1000
SO. SAN FRANCISCO, CA 94080

TEL: (650) 589-1660
FAX: (650) 589-5062

DANIEL L. CARDOZO
KEVIN T. CARMICHAEL
CHRISTINA M. CARO
JAVIER J. CASTRO
THOMAS A. ENSLOW
KELILAH D. FEDERMAN
ANDREW J. GRAF
TANYA A. GULESSERIAN
KENDRA D. HARTMANN*
KYLE C. JONES
DARIEN K. KEY
RACHAEL E. KOSS
AIDAN P. MARSHALL

MARC D. JOSEPH
Of Counsel

*Not admitted in California.
Licensed in Colorado.

June 21, 2021

Via Docket Submittal

Docket No. 21-BSTD-01
California Energy Commission
Dockets Office MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 21-BTSD-01, 2022 Energy Code Rulemaking

Dear Commission Staff:

I am writing on behalf of the California State Pipe Trades Council regarding the proposed residential 2022 California Energy Code amendments being considered for adoption by the Energy Commission. These amendments include 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. They also include similar proposals for high-rise residential and commercial buildings.

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.

2057-128j

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.¹ 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 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.

¹ [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). 2057-128j

June 21, 2021
Page 3

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in blue ink, appearing to be 'KJ' followed by a flourish.

Kyle C. Jones
Thomas A. Enslow

KCJ:ljl