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| Docket Number: | 21-BSTD-01 |
| Project Title: | 2022 Energy Code Update Rulemaking |
| TN #: | 238342 |
| Document Title: | Local Government Commission Comments - on 2022 Energy Code Update Rulemaking |
| Description: | N/A |
| Filer: | System |
| Organization: | Local Government Commission |
| Submitter Role: | Public |
| Submission Date: | 6/21/2021 1:51:36 PM |
| Docketed Date: | 6/21/2021 |

*Comment Received From: Local Government Commission
Submitted On: 6/21/2021
Docket Number: 21-BSTD-01*

CEC Docket No. 21-BSTD-01 06_21_2021

Additional submitted attachment is included below.



Local Government Commission

Leaders for Livable Communities

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Kate Meis Wright

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

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

Dear Commissioners:

The Local Government Commission (LGC) supports local policymakers through nationally-recognized events; cost-effective technical assistance; and policy guidance on climate change, community design, energy, water, and national service. In this role, LGC has long been a leader in advocating policies and practices which will reduce greenhouse gas (GHG) emissions, create a sustainable environment, and promote livable communities. We appreciate the opportunity to appear and respectfully submit the following comments.

As an overarching priority, LGC strongly supports the policy of adoption of a regulatory framework which will promote and provide for decarbonizing the built environment. With as much as 30% of GHG emissions emanating from the built environment, it is crucial that we undertake strategies and approaches that will significantly reduce such emissions in the future. Moving the market toward clean, efficient all-electric new construction constitutes an important step in the right direction, and we applaud the Energy Commission's efforts in this regard. We also encourage the Commission to ensure that the updates to the Code will apply in a manner that fosters equity and avoids exacerbating disparities for historically underserved communities.

We support the following changes made to the code that are especially critical to accelerate building decarbonization:

1. **Compliance incentives that encourage efficient electric space and water heating:** With heat pump baselines set to the largest energy user among space or water heating in each climate zone, the compliance incentive approach has the potential to result in rapid and large-scale adoption of clean electric technologies.
2. **Strengthened and expanded electric-ready requirements:** Making new buildings electric-ready costs very little at the time of construction and will ensure that new homes fueled by gas will be able to affordably upgrade to electric appliances in the future.
3. **Kitchen range hood requirements:** The proposed requirements will improve indoor air quality and recognize the need for more stringency for gas stove hoods than electric stoves due to the higher pollutant risks from gas stoves.

As the Commission is proposing to take a phased transition approach toward an all-electric requirement, the following important improvements are needed to ensure the 2022 code removes unnecessary barriers to advancing clean and efficient all-electric construction:



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1. **Make heat pump water heaters (HPWH) the baseline for single-family in climate zone 10.** Because heating is a relatively small load in climate zone 10, we support adjusting to a HPWH baseline to send a strong incentive toward decarbonization in this region.
2. **Expand the compliance incentive to system types most commonly used in large buildings.** Large non-residential buildings often use multi-zone, packaged, or central HVAC and HPWH systems, and there is currently no compliance incentive for the electric heat pump versions of these systems in the Express Terms. Expanding incentives to all system types is needed to shift all new construction to clean electricity, so there is no need to build new gas infrastructure that will become stranded before the end of its life. As a first step, we recommend that the Commission expand the electric baseline systems to all packaged units, such as rooftop units, including those that serve multi zone systems.
3. **The Commission should continue to enhance the compliance software to be able to model HVAC systems not currently supported, including systems commonly used in large buildings, and advanced heat pumps used in all types of buildings.**

LGC recently strongly supported and participated in the Mayors' Commission on Climate Change led by the Mayors of Sacramento and West Sacramento. We affirmed through this effort the crucial necessity of decarbonizing our built environment as one element of addressing the climate crisis that confronts us. We urge the Commission to build upon such local and state initiatives to continue to play a leadership role by furthering a regulatory framework which will be the underpinning of livable communities for the future.

Sincerely,

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