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*Comment Received From: Dawn Anaiscourt  
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**SCE Support Letter for 2022 Title 24**

*Additional submitted attachment is included below.*

August 10, 2021

California Energy Commission  
Docket Office, MS-4  
Re: Docket No. 21-BSTD-01  
1516 Ninth Street  
Sacramento, CA 95814-5512  
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission  
Docket No. 21-BSTD-01: 2022 Energy Code Update Rulemaking

Dear Commissioners:

Southern California Edison (SCE) thanks the Commissioners, and the California Energy Commission's (CEC) Building Standards staff for their tremendous work on the 2022 Building Efficiency Standards. SCE is fully supportive of the proposed standards, as they mark an important step in supporting the state's greenhouse gas (GHG) reduction goals and broadening customer choice, as demonstrated by the inclusion of prescriptive heat pump baselines, electric readiness requirements for residential buildings, and expanded solar and battery requirements of non-residential buildings.

SCE appreciates the CEC's efforts in taking these measured, incremental steps toward the future goal of an all-electric code. As the state moves toward the 2030 decarbonization target, building electrification adoption needs to rapidly scale to achieve these ambitious energy and environmental goals. SCE looks forward to a 2025 Energy Code that will fully electrify new construction in order to accelerate efforts needed to be on a path to achieve California's 2030 decarbonization target.

SCE continues to support an all-electric code to align with the state's carbon neutrality goal that will avoid natural gas emissions and additional spending on natural gas infrastructure that may become stranded before 2045. It is important to have an all-electric code to help ensure that all communities benefit from clean energy and that low-income and vulnerable communities are not disproportionately burdened by fossil-fuel emissions and stranded assets.

SCE is committed to serving the needs of California's clean energy future. This requires a grid that supports high levels of carbon-free resources, integrates new technologies and services, and remains safe, reliable, affordable, and resilient even as the climate continues to evolve. SCE is modernizing and hardening our distribution system and leveraging increasingly sophisticated hardware and software to manage a complex and intelligent grid. This not only

helps to enable greater adoption of clean energy technologies, but it also improves reliability, while making the grid more resilient to threats exacerbated by climate change such as wildfires and heatwaves. SCE is investing over \$4 billion annually to build a grid that customers can rely upon to support the clean energy future. Customer-owned resources like rooftop solar and battery storage offer an additional level of resiliency. We estimate that by 2045 about half of single-family homes in our service territory will have some combination of solar and storage.<sup>1</sup> At the same time, SCE is working with the CPUC and the California Independent System Operator (CAISO) to ensure that an adequate supply of clean, central generation resources are available when needed and that the transmission system is able to transfer this energy reliably to customers through the distribution system. Supporting California's clean energy future will require continued coordination and advancement across the full electric system.

SCE applauds the CEC for its diligent and thoughtful approach to developing cost-effective building standards that increase customer choice and demonstrate dynamic steps toward achieving California's GHG reduction goals. SCE looks forward to continuing its partnership with the CEC to support the implementation of the 2022 Energy Code through compliance software updates and training, and the development of future Energy Code updates.

Very truly yours,

/s/

Dawn Anaiscourt

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<sup>1</sup> SCE's Pathway 2045, November 2019, p. 6.

Available here: <https://www.edison.com/home/our-perspective/pathway-2045.html>