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August 10, 2021

Chair Hochschild, Commissioners and Staff
California Energy Commission (CEC)
1516 9th St,
Sacramento, CA 95814

Re: Agenda Item 4, Certification of Final Environmental Impact Report and Adoption of the 2022 California Energy Code.

Dear Chair Hochschild, Commissioners and Staff:

On behalf of the Los Angeles County Chapter of the National Electrical Contractors Association, which represents 300 electrical contracting companies who employ over 7,000 electricians throughout Los Angeles and Ventura counties, we strongly support the adoption of the proposed 2022 Energy Code. Not only is this code essential for California to achieve its aggressive climate goals, facilitating the adoption of sustainable energy technologies will create new careers in the rapidly expanding clean energy sector.

By requiring new prescriptive solar photovoltaic and battery storage for many categories of newly constructed nonresidential building types, the proposed code will create a more resilient and reliable grid. As California continues to electrify, it is essential to have distributed solar and storage that can smooth our peak demands, reduce the burden on our transmission and distribution systems in this time of unpredictable wildfires and ease some of the burden of blackouts.

California's buildings are responsible for 25% of its GHG emissions; most of this comes from gas and propane appliances. Gas-fueled furnaces, water heaters and stoves significantly compromise air quality and occupant health. By establishing standards to facilitate building electrification and improve air quality, this code will have important health benefits while improving the potential economic benefits of solar and storage.

Our organization is not just talking about resiliency, reliability and air quality; we've acted. Our industry converted our Electrical Training Institute to a "Zero Emissions Building." At the time, it was the largest zero emissions retrofit in the nation. We have also installed a state-of-the-art microgrid where our electric vehicles and batteries can serve as back-up power to our building and has the ability to shave peak demand. The facility serves as a living laboratory of sustainable energy technologies including the first of its kind DC to DC lighting solution which will have the ability to efficiently provide DC power to devices such as LED's and DC appliances. From our experience, we know that adopting strong regulations for new construction is much easier and less expensive than later retrofitting an existing facility.

Our contractors and electricians have significantly invested in leading and advancing zero emissions solutions. We are experienced, trained and ready to continue this work. This code is an important step.

Sincerely,



James Willson

Executive Director

National Electrical Contractors Association, Greater Los Angeles