

DOCKETED

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November 17, 2023

California Energy Commission
Re: Docket No. 22-BSTD-01
715 P Street
Sacramento, CA 95814
docket@energy.ca.gov

Re: 2025 Energy Code Pre-Rulemaking – Express Terms

Dear Commissioners,

The undersigned community, environmental justice, climate, and environmental groups are writing in support of proposals included in the CEC's 2025 Energy Code Draft Express Terms that will help enable the closure of the Aliso Canyon Gas Storage facility, site of the disastrous 2015 gas leak that poisoned surrounding communities.

Communities in the San Fernando Valley have been demanding for eight long years that California prioritize their health and safety by closing Aliso. Not only is the site still operational today, but Newsom-appointed commissioners at the California Public Utilities Commission (CPUC) voted earlier this year to increase gas storage capacity limits. Pumping more gas into Aliso increases the risk of another major leak.

Closing Aliso Canyon once and for all requires lowering peak gas demand in Greater Los Angeles. The Draft Express Terms include language that will support this aim by encouraging the installation of highly-efficient electric heat pumps, which eliminate the need for gas furnaces in the winter months. We are supportive of this language, and believe it is imperative that Southern California climate zones are included in the proposal to support the closure of dangerous gas infrastructure.

Encouraging households to replace their burnt-out air conditioning units with electric heat pumps, which provide cooling and heating in a single technology, is a commonsense step that will reduce California's reliance on fossil fuels. In the greater Los Angeles Area, approximately two thirds of all existing homes have central air conditioners.¹ If every Californian shopping for an AC unit instead bought a highly-efficient heat pump, California could electrify space heating

¹ Analysis of Central AC Data using 2019 RASS Data,
<https://www.energy.ca.gov/publications/2021/2019-california-residential-appliance-saturation-study-rass>

in [more than half of homes](#) by 2030, compared to just [19% of homes](#) given our state's current trajectory, according to a recent report from the Building Decarbonization Coalition.

In addition to including terms that will lower gas demand in existing buildings, the Draft Express terms also includes important proposals that will help California avoid increasing our gas dependence by building new fossil fuel homes. New homes should utilize electric equipment for all end uses – the Draft Express Terms make meaningful progress from the 2022 Building Code to encourage building with heat pumps for both space and water heating in new homes and buildings.

Gov. Gavin Newsom [told reporters in 2019](#) that he was working to “fast-track” closure of Aliso Canyon. Moving forward with language in the Draft Terms that encourages households to upgrade to a heat pump when their gas furnace burns out is a meaningful step that will help enable Governor Newsom to follow through on his promise, while equipping homes across California with superior clean energy technologies.

Sincerely,

Chirag Bhakta, California Director
Food & Water Watch

Matt Pakucko, President and Co Founder
Save Porter Ranch

Gabriel Khanlian, Past President of Porter Ranch NC

Andrew Krowne, President
Environmental Health Research Inc.