

October 20, 2020

California Energy Commission
Docket Office, MS-4
Re: Docket No. 19-BSTD-03
1516 Ninth Street
Sacramento, CA 95814
docket@energy.ca.gov

Re: Staff Workshop: 2022 Energy Code Pre-Rulemaking – Proposed 2022 Energy Code on Electrification

Dear Commissioners,

On behalf of SPUR, we thank you for the opportunity to comment on the California Energy Commission's (CEC) proposed 2022 Building Energy Efficiency Standards (Energy Code) on Electrification. SPUR is a non-profit urban research and advocacy organization based in the San Francisco Bay Area. For over 100 years, we have worked to make the region more prosperous, equitable and sustainable.

We appreciate the CEC's efforts to encourage the use of heat pumps, and we support the proposal's use of compliance incentives for all-electric buildings. However, the proposal is insufficient to shift the market to all-electric new construction. **We urge staff to set strong decarbonization requirements by tightening the gas baseline, in order to lead to broad adoption of all-electric new construction.**

In our report, *Fossil Free Bay Area*, SPUR identified electrifying buildings as one of nine key strategies for the Bay Area to achieve a zero-carbon future.¹ Thirty-five cities and counties in California are already leading the way, having passed reach codes and natural gas infrastructure moratoriums to reduce buildings' reliance on natural gas. As California grapples with the climate crisis, the CEC must take the lead and set the building industry (i.e. manufacturers, architects, real estate agents, builders and contractors) on a clear path towards all-electric construction statewide.

Under current policies, California is projected to miss its 2030 climate goal, emitting 25 million metric tons (MMT) of carbon dioxide equivalent over the goal of 259 MMT.² To correct course, the state needs to move expediently to electrify buildings. Delaying the code update until the next

¹ SPUR, *Fossil Free Bay Area*, 2016, <https://www.spur.org/publications/spur-report/2016-09-21/fossil-free-bay-area>

² Busch, Chris, and Robbie Orvis. *Insights from the California Energy Policy Simulator*, Fig. ES-1. Energy Innovation, 2020. https://energyinnovation.org/wp-content/uploads/2020/05/Insights-from-the-California-Energy-Policy-Simulator_5.6.20.pdf.

cycle and allowing buildings with gas effectively through 2029 would result in an additional three million tons of carbon emissions by 2030.³

Newly constructed buildings will be in use for decades and continuing to connect new buildings to gas makes it much harder and costlier to convert them to clean electricity later. Therefore, we urge the CEC to set stronger decarbonization requirements in this code update.

Sincerely,



Laura Feinstein, Ph.D.
Sustainability and Resilience Policy Director



Susannah Parsons
Senior Policy Associate

³ Grab, Denise, and Amar Shah. “California Can’t Wait on All-Electric New Building Code.” Rocky Mountain Institute, July 28, 2020. <https://rmi.org/california-cant-wait-on-all-electric-new-building-code/>.