



August 10, 2021

The California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**Regarding: Support for 2022 Energy Code (Docket 21-BTSD-01)**

The American Institute of Architects California (AIA CA), an association of over 10,000 architects in California, supports the adoption of the proposed 2022 Energy Code.

We support the proposed 2022 Energy Code developed by the California Energy Commission which promote building decarbonization through electrification and improved efficiency. These Standards will lower costs, reduce unhealthy pollutants, and help California meet it's stated climate goals.

Notable are:

- A performance-based requirement for heat pump water heaters in the majority of climate zones in California. This is important because of the significant savings in energy use as well as Greenhouse Gas Emissions when switching from gas water heaters to heat pumps.
- Electric readiness for all buildings by requiring infrastructure for electrification when it is most cost effective, during initial construction.
- The requirement for greater ventilation requirements for gas cookstoves than electric ones, which will encourage use of electric induction stoves.

While this progress is positive, it is only one of the many steps needed in the face of the urgency established by the report of the Intergovernmental Panel on Climate Change released on August 6, 2021. In the face of this unfolding crisis, AIA CA has formally recognized a climate emergency (<https://aiacalifornia.org/aia-california-declares-a-climate-emergency/>) and committed to sustained and continuous actions that address both climate deterioration and California's pressing issues in housing, resiliency, conservation of resources, equity, and sustainability.

The American Institute of Architects

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We plan to continue to work closely with the California Energy Commission leadership, staff and all other stakeholders to find ever more comprehensive and impactful means to achieve and meet the urgency of Climate Action.

Sincerely,

A handwritten signature in black ink, appearing to be 'Brett Dougherty', with a long horizontal flourish extending to the right.

Brett Dougherty, AIA  
2021 President  
AIA California