PENINSULA CLEAN ENERGY | SILICON VALLEY CLEAN ENERGY | OFFICE OF SUSTAINABILITY, COUNTY OF SAN MATEO

Local Amendment to Code ("Reach Code")

Los Altos Environmental Commission

July 8, 2019

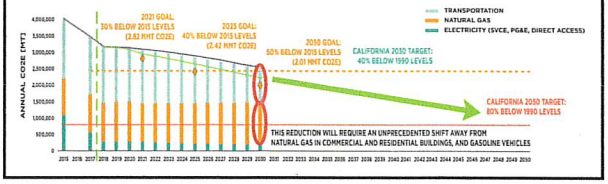
TRC Results you can rely on | DNV·GL

Today's Objectives

- State has ambitious goals for carbon reduction
- Cities need to take actions to meet those goals
- Cities can amend Building Codes to support meeting those goals
- Model Code Language developed to accomplish the above

Goal - Increase Electrification of Buildings

- **Emissions reductions** and decarbonization
  - CA Executive Order B-55-18 for Carbon Neutrality by 2045
  - Sourcing clean electricity has never been easier
  - **Natural Gas and Transportation contributions must reduce**



Summary about Code

Title 24 provides the following for three years until the next code cycle:

Building Pathways (Energy Code)

1. Dual-Fueled (electricity + natural gas) – a cost effective model or list
2. All-Electric – a cost effective model or list

EV Charging (CalGreen)

A minimum Quantity, Readiness, and Recharging Rate for electric vehicle charging stations per building type – single family, multifamily, commercial

What about Building Codes

- All New Construction must meet Title 24 Building Codes
  - Code governs both the building and the EV charging infrastructure *(among other things)*
    - **Natural Gas:** Many buildings use fossil fuels for heating (space and water)
    - **Transportation:** Some vehicles (EV's for example) pollute less than their fossil fuel peers
- Cities can make local amendments to those Codes to meet local conditions or values
  - A Local Amendment (or Reach Code) must include at least one cost-effective pathway
- A building code, based on what it contains, can encourage the selection of the Pathway based on what is required within the Pathways.

Reach Codes – What & Why

Why

- Maintaining the lowest cost construction option (all-electric) encourages developers to build cleaner, healthier, lower cost buildings fueled by pollution free electricity.
- Santa Clara county leads the state in EV adoption rate. The base recommendation is too low to meet local need. Installing charging stations later cost 2-4x as much.

Figure 2. New electric vehicle market share in 2017, (vehicle registrations from the Automot

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What can we do with Code

Introduce change (a local amendment) within one pathway that encourages the selection of the other pathway. Here's an example for Single Family homes....

	Base Title 24 Code		or Proposed Reach Code		or CalGreen Reach Code	
	Dual Fueled	All Electric	Dual Fueled	All Electric	Dual Fueled	All Electric
Required Code	Base Code	Base Code	Reach Code	Base Code	Reach Code	Base Code
Incremental Cost[1]	$0	$0	$5,500	$0	$15,000	$0
Cost Effective	Yes	Yes	Yes	Yes	No	Yes
Incremental Equipment[1]	None	None	Solar Thermal or Batteries	None	Solar Thermal or Batteries + Green Constr.	None
Carbon Emissions	Tons	Pounds	Tons	Pounds	Tons	Pounds
Frequency of Use	Most	Least				

1. To meet Code

A ban on gas would result in only All-Electric buildings but cannot be accomplished within the Building Code.

Reach Code – EV Charging

CalGreen (Part 11) provides minimum requirements for each aspect of EV Charging per building type

Building Type	Quantity	Readiness	Charging Speed
Residential	1 per dwelling unit	Capable	Level 2
Multi-Unit Dwelling	10% of total spaces	Capable	Level 2
Commercial	6% of total spaces	Capable	Level 2

Readiness: Installed, Ready, Capable

To enact a reach code for EV charging, increase the **Quantity, Readiness** and/or **Charging Speed.**

Building Type	Quantity	Readiness	Charging Speed
Residential	1 per dwelling unit 1 per dwelling unit	~~Capable~~ Ready Ready	Level 2 Level 1
Multi-Unit Dwelling	~~10%~~ 25% of total spaces 75% of total spaces	~~Capable~~ Ready Ready	Level 2 Level 1
Commercial	~~6%~~ 10% of total spaces 10% of total spaces 30% of total spaces	~~Capable~~ Installed Ready Capable	Level 2 Level 1 Level 2

Speed: Level 3, Level 2, Level 1

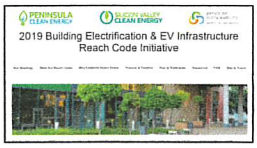
[above charts simplified for illustration purposes]

Sample Recommendation

- **Buildings: Adopt a Reach Code** to encourage developers to select healthier, safer, all-electric buildings.
  - By increasing the cost to construct for fossil fueled buildings, this pathway becomes less attractive.
    - Note: natural gas fueled homes already cost about $5,000 more to construct
  - A developer can select the lowest cost pathway, All-Electric
- **EV: Adopt a Reach Code** reflects Santa Clara County's much higher than average adoption rate, provides more opportunities for EV's within the multifamily community, and saves money by doing so during construction, rather than retrofitting later.

Questions?

Reach Code Websites:
SiliconValleyReachCodes.org



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1. BUILDING CODE ORDINANCES TO SUPPORT ELECTRIC VEHICLE (EV) CHARGING INFRASTRUCTURE FOR NEW CONSTRUCTION & ALTERATIONS (2019)

Appendix Slides

What is Cost-Effective

- Definition of Cost Effectiveness (applies to Buildings Only)
  - "any required measure must save at least as much on the utility bill as the measure itself costs"
    - So, if a measure costs $1500, it must save $1500 or more on future utility bills
- The default code (aka Title 24 without local amendment) is considered cost effective by the California Energy Commission.

What is a Pathway

- Definition of Pathway
  - "the code must include separate methodologies based upon the fuel source (natural gas, electricity, or both) of the building"
    - A natural gas only building essentially does not exist. So, a dual-fuel building is more likely, using a combination of natural gas and electricity.

Outcome
- **Dual-Fuel** Building – a **model or list** of what is required
- Electricity-fueled (aka **"All-Electric"**) Building – a **model or list** of what is required

Will More Electric or All-Electric Help?

- **Cost Savings**
  - Lower first costs by not constructing natural gas infrastructure
  - Operational costs (dependent on many factors)
- **Lower risk pathway** according to California Energy Commission
- **Healthier air quality** from eliminating indoor combustion according to California Air Resources Board
- **Massive carbon reduction** compared to current dual fuel (natural gas + electricity) buildings

Already included in 2019 Title 24 Code

	Residential	Nonresidential
Performance Compliance Margin	Energy Design Rating (EDR)	Percentage
Solar Photovoltaics (PV) Installation	Sized to offset annual kWh consumption of mixed-fuel	*n/a*
Electric-ready	120V/20A for future electric water heater installation	*n/a*

These model codes …

- Represent maximum found **cost-effective**
- Balance regional **consistency** and ability for **customization**
  - Strong suggestions are not formatted
- Live in **Energy Code**, but can be integrated with other codes
- Should be reviewed and refined through your normal processes

Mandatory for New Construction, Additions, Alterations

Item	Code Reads	Reach Code Reads	Optional add-on to Reach Code
Water Heating	120V/20A circuit	240V/30A circuit* Condensate drain	Location/design addressing air source and footprint
Clothes Drying	-	240V/40A circuit*	
Cooking	-	240V/50A circuit*	
Space Conditioning	-	-	240V/30A circuit*

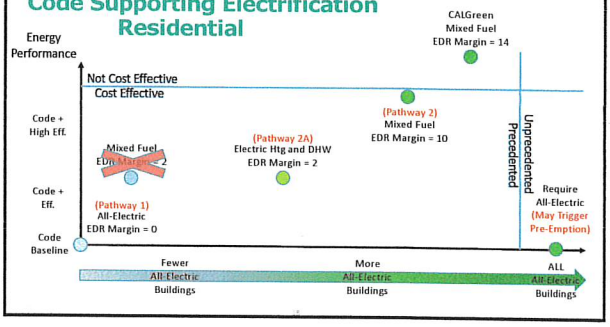
*or adequate capacity

Reach Code Optional Requirements

Item	Reach Code Option
Solar (PV) installed	Require PV (non-residential only)
Performance documentation	Encourage building simulation and compliance forms by certified energy analysts (must include definition of what meets certified standard)

Options are formatted with green highlights

Code Supporting Electrification Residential



Single and Two-family New Construction

	Performance Path	Prescriptive Path
1 + 2 OR	**1. All Electric.** Demonstrate that the proposed home will be all electric, OR	**Build All Electric.** Meet 2019 Title 24 Part 6.
1 + 2 OR	**2. Mixed Fuel Building.** Proposed Design Building shall be at least 10 EDR points less than the Total Energy Design Rating calculated for the Standard Design Building, OR	**Mixed Fuel Building** a. Low leakage ducts b. R-10 perimeter slab insulation c. Compact hot water distribution d. Fan efficacy of 0.35 Watts/cfm e. Either 1) 5 kWh battery OR 2) A solar water heating system.
1 + 2 + 2A	2A. Electrically Heated Building (electric space and water heating, gas cooking and/or clothes drying). Proposed Design Building shall be at least 2 EDR points less than the Energy Efficiency Design Rating calculated for the Standard Design Building, OR	Electrically Heating Building a. Low leakage ducts b. R-10 perimeter slab insulation c. Compact hot water distribution d. Fan efficacy of 0.35 Watts/cfm

"Menu options" are formatted with green highlights

Multifamily New Construction (≤3 stories)

	Performance Path	Prescriptive Path
1 + 2 OR	**1. All Electric.** Demonstrate that the proposed home will be all electric, OR	**Build All-Electric** and Meet 2019 Title 24 Part 6.
1 + 2 OR	**2. Mixed Fuel Building.** Proposed Design Building shall be at least 10 EDR points less than the Total Energy Design Rating calculated for the Standard Design Building, OR	**Mixed Fuel Building** a. low leakage ducts in conditioned space b. 0.25 ASR cool roof c. R-10 slab insulation d. compact Hot Water distribution e. 0.35 W/cfm HVAC fan d. Either 1) 2.75 kWh battery/dwelling OR 2) A solar water heating system.
1 + 2 + 2A	2A. Electrically Heated Building (electric space and water heating, gas cooking and/or clothes drying). Proposed Design Building shall be less than the Energy Efficiency Design Rating calculated for the Standard Design Building	Electrically Heated Building Meet 2019 Title 24 Part 6

"Menu options" are formatted with green highlights

Nonresidential

	Performance Path	Prescriptive Path
1 + 2 OR	**1. All Electric.** Demonstrate that the proposed building will be all electric, OR	**Build All Electric** and meet 2019 Title 24 Part 6.
1 + 2 OR	**2. Mixed Fuel Building, All Occupancies.** Demonstrate that the energy use of the proposed building is 9% more efficient than the 2019 State Energy Code, OR	**Mixed Fuel Building** a. Fenestration with a solar heat gain coefficient ≥ 0.22. b. Airflows to be equal to the zone ventilation minimums. c. Economizers in air handlers ≥ 33,000 Btu/h d. Reduced the lighting power density (Watts/ft2) by ten percent (10%) e. In common areas, improve lighting: 1) Daylight dimming plus off AND 2) Institutional Tuning f. Install drain water heat recovery.
1 + 2 + 2A	2A. Mixed Fuel Building, Office and Mercantile. Demonstrate that the energy use of the proposed building is 15% more efficient than the 2019 State Energy Code	Mixed Fuel Building a. Fenestration with a solar heat gain coefficient ≥ 0.22 b. E/W fenestration area is ≤ ½ of the N/S fenestration c. Airflows to be equal to the zone ventilation minimums. d. Economizers in air handlers ≥ 33,000 Btu/h e. Reduced the lighting Watts/ft² by 10% f. Improve lighting: 1) Daylight dimming plus off AND 2) Institutional Tuning AND 3) Occupant Sensing in open plan offices

Frequently Asked Questions

- **Additions/Alterations/ADUs?** – Electric-ready req's only
- **High Rise Multifamily?** – Carve-out added to code with results ~Aug/Sep
- **Mixed Use?** – Average of compliance margins required in other spaces, weighted by floor area
- **Core and Shell Nonresidential? –** Exception for core-and-shell which allows plumbing to be installed with no increased performance required. When gas meter is installed (i.e., the tenant would like gas) reach code is required. *(currently under development)*

Where Are We Now?

- For each building type, select **1 & 2, 1 & 2 & 2A**, or **Other (specify)**
  - Single and Two-Family
  - Multifamily (≤3 stories)
  - Nonresidential
- Report out on current thinking. This is not a commitment.

Discussion

- What works?
- What is still unresolved?
- How closely aligned are we? How important is that?

Electric Vehicle Code

CALGreen Enhancements

EV Terms, Charge Rates

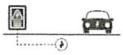
Level 1 "Trickle Charging"
Standard household outlet 15-20 Amp, 120v AC
Driving distance provided: 3-4 miles/hour

Level 2 "Standard Charging"
Equivalent to a dryer outlet. 40+ Amp, 208/240v AC
Driving distance provided (standard charging): 25-30 miles/hour

Level 3 "DC Fast Charging / SuperCharging"
24-350kW
Driving distance provided 72-1,200 miles/hour

EV Terms, Readiness of Charging Station

EV **Capable** - *Some Assembly Required*
Panel **capacity,** raceway (**conduit**) only at critical areas (underground, pinch points, etc.) Definition is less stringent than CALGreen 2019



EV **Ready** - *Plug & Play*
Panel **capacity,** raceway (**conduit**), overcurrent protection device (**breaker**), **wire**, **receptacle** & signage.
Can refer to Level 1 or Level 2

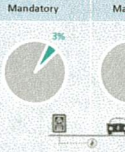
EV **Charging Station** (EVCS) - *Level 2 Charge!*
Charging station fully installed. All the equipment needed to deliver electrical energy from an electricity source to the EV at Level 2

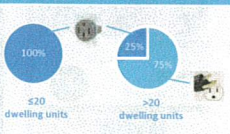
Single and Two-family New Construction

	2016 CALGreen	2019 CALGreen	PCE/SVCE Proposed
	Mandatory	Mandatory	
Single Family Two-Family Townhome	(1) Level 2 EV Capable for one parking space per dwelling unit "EV Capable" is more extensive than that proposed by PCE/SVCE		2 EV spaces total: • 1 Level 2 EV Ready circuit • 1 Level 1 EV Ready circuit

Multifamily New Construction

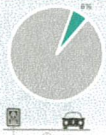
	2016 CALGreen	2019 CALGreen	PCE/SVCE Proposed
	Mandatory	Mandatory	
Multi-Family	3% Level 2 EV Capable for buildings with ≥17 units	10% Level 2 EV Capable	≤20 units: One Level 2 EV Ready **per dwelling** >20 units: Of all dwelling units, • **25%** Level 2 EV Ready (10% in affordable housing) • **75%** are Level 1 EV Ready (90% in affordable housing)

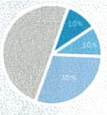




Non-Residential, Office & Commercial

	2016 CALGreen	2019 CALGreen	PCE/SVCE Proposed
	Mandatory	Mandatory	
Non-Residential	~6% Level 2 EV Capable (for buildings with at least 10 parking spaces)		Office building: • **10%** Level 2 EVSE • **10%** Level 1 EV Ready • **30%** EV Capable or EV Ready Commercial: Of all parking spaces • **6%** Level 2 EVSE • **5%** Level 1 EV Ready • Over 100 spaces: option for 80kW DC Fast Charger per 100 spaces





Where Are We Now?

- For each building type, identify ✓ **OK as is**, or
  Increase **Quantity**, **Readiness**, or **Charge Rate**
  - Single and Two-Family
  - Multifamily (≤3 stories)
  - Nonresidential
- Report out on current thinking. This is not a commitment.

Discussion

- What works?
- What is still unresolved?
- How closely aligned are we? How important is that?

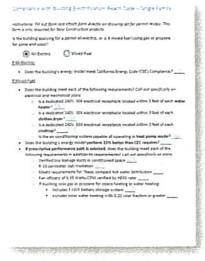
Tools and Resources

Adoption Tools & Resources

Presentation to Council
- Staff Report Template
- Reach Code Ordinance Language
- Presentation Template

Information for Council
- Carbon Emissions Savings
- Housing Impacts
- FAQs
- Cost Effectiveness Presentation

Implementation Tools & Resources



Permitting, enforcement, and inspection resources
- Permit Checklist
- Inspection Checklist
- Training for Building Department Staff
- FAQs

Implementation Tools & Resources

Public and Building Owner Resources
- Case Studies
- Website
- Homeowner Flyer
- FAQs on website
- Trainings for Environmental Advocates
- Community Advocates List
- Cost Effectiveness Presentation Tool
- Carbon Emissions Savings
- Housing Impacts

How do we go from here to there?

Conceptual Next Steps

- **Staff agreement on proposal**
  - What is needed for this?
- **Stakeholder Engagement(s)**
  - What is needed for this?
  - Refine as warranted
- **Including this topic on Council calendar**
  - What Month are you planning to vote on Building Codes?
  - What is needed? Staff Report? Other?

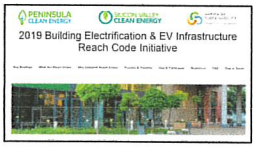
Wrap-up

- Summarize findings of "Where are we Now"
- Schedule support for your upcoming internal, stakeholder, or council meetings
- Develop additional tools/resources

"Together, we can make an incredible difference – Economics and the Environment both win in this Reach Code."
-- Unnamed SVCE staff member

Questions?

Reach Code Websites:
PeninsulaReachCodes.org
SiliconValleyReachCodes.org



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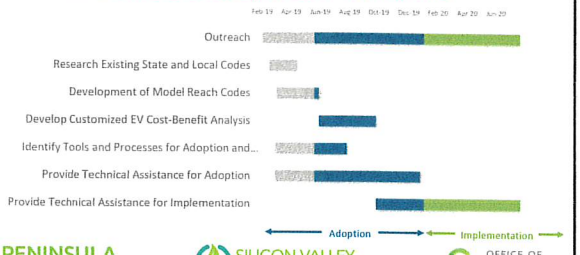
Reach Code Development Timeline



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Next Steps

Activities:
- Review Proposed Reach Codes with your city staff members
- Share this with important community groups and commissions
- Engage Consultation support by contacting your respective OOS/PCE/SVCE representative
- Request $10k Grant from PCE/SVCE
- Sign up for June 6th EV Infrastructure Code Webinar

Questions:
- Is this on an internal commission schedule?
- Is this scheduled on a Council Agenda?
- Has legal reviewed the proposed language?
- When does your city plan to vote on all new Title 24 language?

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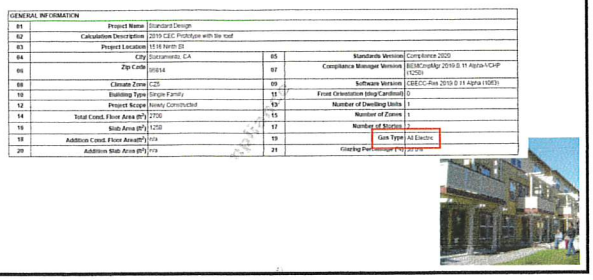
Compliance and Enforcement

Plan Check / Permit – Compliance Form



GENERAL INFORMATION					
01	Project Name	Standard Design			
02	Calculation Description	2019 CEC Prototype with tile roof			
03	Project Location	1516 Ninth St			
04	City	Sacramento, CA	05	Standards Version	Compliance 2020
06	Zip Code	95814	07	Compliance Manager Version	BEMCmpMgr 2019.0.11 Alpha1/CHP (1250)
08	Climate Zone	CZ5	09	Software Version	CBECC-Res 2019.0.11 Alpha (1083)
10	Building Type	Single Family	11	Front Orientation (deg/Cardinal)	0
12	Project Scope	Newly Constructed	13	Number of Dwelling Units	1
14	Total Cond. Floor Area (ft²)	2700	15	Number of Zones	1
16	Slab Area (ft²)	1250	17	Number of Stories	1
18	Addition Cond. Floor Area(ft²)	n/a	19	Gas Type	All Electric
20	Addition Slab Area (ft²)	n/a	21	Glazing Percentage (%)	27.8%

Plan Check / Permit – Compliance Form

Mixed-fuel residence (Option 3), Total EDR Compliance Margin **≥ 2.**

This project meets compliance margin

ENERGY DESIGN RATING	Energy Design Ratings		Compliance Margins	
	Efficiency* (EDR1)	Total* (EDR2)	Efficiency* (EDR1)	Total* (EDR2)
Standard Design	52.7	31.8		
Proposed Design	50.7	29.8	2.0	2.0
RESULT: COMPLIES				

Mixed-fuel nonresidential building (Option 2), Compliance Margin **≥ 9%**

CF1 COMPLIANCE RESULTS FOR PERFORMANCE COMPONENTS (Annual TDV Energy Use, kBtu/ft² · yr)			
COMPLIES			
Energy Component	Standard Design (TDV)	Proposed Design (TDV)	Compliance Margin (TDV)*
Space Heating	10.29	10.29	-
Space Cooling	75.28	74.39	0.91
Indoor Fans	119.55	119.02	0.47
Heat Rejection	-	-	-
Pumps & Misc.	-	-	-
Domestic Hot Water	8.52	8.52	-
Indoor Lighting	28.80	28.80	-
ENERGY STANDARDS COMPLIANCE TOTAL	242.53	242.45	0.08 (0.0%)

This project does not meet compliance margin

EV Interest & Adoption

- Residents very interested in adopting EVs
- PCE Survey: Interest in adopting is independent of whether they have a garage
- *Charging access is the #1 concern*

Palo Alto Resident Survey

- 7 in 10 existing EV drivers likely to get a 2nd EV
- 70% of non-EV drivers "extremely" interested in getting an EV *if they knew charging would be readily available*

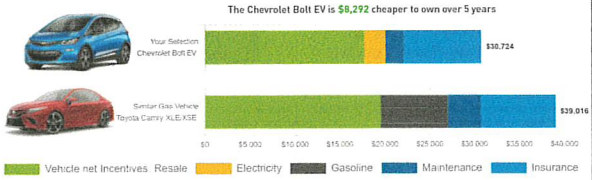
75% open to obtaining an EV

36% Very likely to obtain an EV

95% *Sales increase 2017 to 2018* Santa Clara County

Why CA & Bay Area?

New EV vs. New Gas Car



Local Economic Impacts

Reduced fueling costs for residents

- By 2025 approximately 100,000 EVs in PCE and SVCE
- EV savings over gas car $1,200+/year

Over $100M/yr *Savings by Santa Clara and SVCE territory Residents*

Reduced capital expenses

- 50,000 new housing units
- EV Reach Code <$1.5k/unit at new construction
- $7k/unit for retrofit

$300M *In avoided retrofitting costs*

Savings (and costs) stay local

Feedback on Draft & Response

- **EV Ready is preferred:**
  - *Access to Power*
- **Level 1 can be effective, reduce costs:**
  - *High Level 1 to Level 2 Ratio*
- **Impact on Affordable Housing:**
  - *Lower power requirements*
  - *Incentives*
- **Future Technologies:**
  - *Large raceway*
  - *Load management*
- **DC fast charging:**
  - *Option for commercial sites*

EV Requirements, Summary

ELECTRIC VEHICLE OUTLET

Residential

Single Family: Complete L1 + L2 EV Ready circuits

Multifamily Buildings (<=20 units):
- One L2 EV Ready circuit per dwelling unit

Multifamily Buildings (>20 units):
- 25% of units: L2 EV Ready &
- 75% of units: L1 EV Ready

Affordable Housing (+ PCE/SVCE funding)
- 10% of units: L2 EV Ready &
- 90% of units: L1 EV Ready

Non-Residential

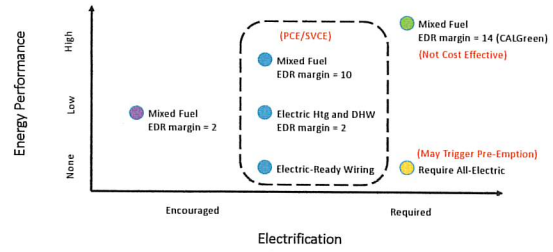
Workplace/ Office
- 10% of parking spaces L2 EVSE &
- 10% of parking spaces L1 EV Ready &
- 30% of parking spaces: EV Capable or EV Ready

Other Non-Residential Buildings
- 6% of parking spaces: L2 EVSE &
- 5% of parking spaces: L1 EV Ready &
- DC Fast Charging Option over 100 spaces

Affordable Housing

1. *Adjusted Code Requirement*
   - 10% Level 2 EV Ready (CALGreen)
   - 90% Level 1 EV Ready
2. *Financial Support Program (Under Development)*
   - To cover most or all of install cost above State code
   - Available in cities that adopt reach codes
   - Available during the 2020-2022 code cycle
   - Specific funding amounts are under development
   - Technical assistance on implementation, including policies such as pricing, access control, etc.

Reach Code Map (Electrification v Performance)



Brisbane Staff Reach Code Proposals

Building Type	Mandate to install solar PV			Increase Energy Efficiency & encourage building electrification (no natural gas)		Electric Vehicle Charging Infrastructure	
	2019 State Code	Current Reach Code	Proposed Reach Code	2019 State Code	Proposed Reach Code	2019 State Code	Proposed Reach Code
Single Family or Duplex	Solar PV installation required to offset annual energy use (except HVAC).	Min. 1kW PV system + cool roof	none! drop (base code covers PV, cool roof may not be cost-effective)	No requirement	Two pathways: 1) All-electric 0% 2) Mixed-fuel 15% (delta EDR 2) + Electric wiring for all gas appliances	1 EV Capable space per unit	1 L2 EV Ready space per unit
Small Multifamily*		Min. 2 kW PV system + cool roof			Two pathways: 1) All-electric 0% 2) Mixed-fuel 5% + Electric wiring for all gas appliances	10% EV Capable	
Large Multifamily**	No requirement	Min. 3 kW PV system + cool roof	continue current PV reach code & drop cool roof		Two pathways: 1) All-electric 0% 2) Mixed-fuel 5% + Electric wiring for all gas appliances		1 L2 EV Ready space per unit w/ load sharing*
Hotels		<10,000 SF = Min. 3 kW PV system; >10,000 SF = Min. 5 kW PV system + cool roof			Two pathways: 1) All-electric 0% 2) Mixed-fuel 15% + Electric wiring for all gas appliances	6% EV Capable	15% L2 EVSE installed + 25% EV Ready + remainder EV Capable w/ load sharing & parking type considerations*
Retail + Office							
Other Non-Residential (Industrial, etc)							

* Small Multi-Family defined in City's current Reach Code as 3-10 units; in PCE Proposed EV Reach Code as >20 units

** Large Multi-Family defined in City's current Reach Code as 11+ units; in PCE Proposed EV Reach Code as 21+ units; for building electrification 4+ stories

~ May not be able to require any additional for mixed fuel if EE only, waiting for further study.

* See PCE proposal regarding load sharing & parking type considerations for EV Reach Code; also consider how parking is arranged, particularly for MUD

Key Terms

All-Electric - Buildings using permanent supply of electricity for space heating, water heating, cooking, and clothes drying, with no natural gas plumbing installed.

Mixed Fuel – Uses natural gas or propane as fuel for space heating, water heating, cooking appliances or clothes drying appliances or is plumbed for such equipment.

Compliance Margin – How much less energy a building uses than state code, expressed as a percentage (e.g., 5%) or EDR (e.g., 1 point)

Mandatory Requirements – Features that must be installed, as applicable.

Performance Pathway – Demonstrate compliance using a *compliance margin* using CEC-approved modeling software.

Prescriptive Pathway – Demonstrate compliance using a *list of specific measures* (e.g. drain water heat recovery).

Climate Zone – Santa Clara county is located primarily within Climate Zone 4.

PURPOSE of the Reach Code

- Encourage developers to select cleaner electric pathway
- Preserve at least one lowest cost construction pathway for each building type (just meet the code, no reach)

How can we do this?

- By maintaining Title 24 baseline code for all-electric buildings, the all-electric pathway becomes more appealing to developers from a cost perspective and resulting in a lower emissions, healthier building.