



April 19, 2022

The Honorable Anna Caballero
Chair, Senate Governance and Finance Committee
1021 O Street, Room 7620
Sacramento, CA 95814

RE: SB 1393 (Archuleta) Energy. Appliances. Local Requirements.
Notice of OPPOSED UNLESS AMENDED *(As Amended on April 18, 2022)*

Dear Senator Caballero,

The League of California Cities (Cal Cities) and the California State Association of Counties (CSAC) must **respectfully oppose unless amended** SB 1393 (Archuleta), which would add new considerations for local governments when creating ordinances that require electrification of existing buildings.

Our organizations appreciate the amendments taken on April 18 and thank the author and sponsors for addressing some of our concerns. However, we continue to have some reservations about what specific considerations local governments must make and want to ensure that more technical expertise is available from the California Energy Commission (CEC) for local governments when crafting such electrification ordinances.

Climate change is an urgent threat to the health and well-being of California's residents and economy. California cities and counties are critical partners with the state in achieving our shared climate change, emission reduction, and clean energy goals, including residential and commercial building decarbonization. Per the updated 2022 Energy Code¹, the CEC encourages building electrification consistent with and supportive of important statewide goals for decarbonization. We remain concerned that the process outlined in SB 1393 could make it more difficult for local governments to develop such ordinances without providing more resources to help in the developing process.

If the goal of the SB 1393 is to ensure that local electrification ordinances are carefully created, **we respectfully request amendments to require the CEC provide additional technical assistance, upon request of the local government, when local governments are in the process of developing such ordinances.** Giving local governments the access to more tools when creating these ordinances will help improve the ordinance's quality, without slowing down the process.

¹ [2022 Building Energy Efficiency Standards](#)

Cal Cities and CSAC also recognize and share the Author's concern regarding any possible impacts to low-income Californians and disadvantaged communities. However, we continue to believe that local governments' existing ordinance development processes would take steps to mitigate against disproportionate impacts to disadvantaged communities, which includes but is not limited to, hosting stakeholder meetings, conducting public outreach, engaging with the local business community and environmental leaders, and directing staff to do research and analysis. This would make some of the additional considerations potentially unnecessary.

As such, Cal Cities and CSAC encourage the Legislature to not add additional "green tape," and make it easy for local governments to have the ability to accelerate the reduction of emissions of greenhouse gases in their communities to meet our shared climate resiliency goals.

For these reasons, Cal Cities and CSAC **opposes SB 1393 (Archuleta) unless it is amended**. If you have any questions, do not hesitate to contact Derek Dolfie (Cal Cities) at ddolfie@calcities.org or Christopher Lee (CSAC) at cleee@counties.org.

Sincerely,



Derek Dolfie
Legislative Affairs, Lobbyist
League of California Cities



Christopher Lee
Legislative Representative
California State Association of Counties

cc: The Honorable Bob Archuleta
Members, Senate Governance and Finance Committee
Colin Grinnell, Staff Director, Senate Governance and Finance Committee
Ryan Eisberg, Policy Consultant, Senate Republican Caucus