

November 4, 2021

Chairman Peterson  
Uniform Building Code Commission  
160 East 300 South  
Salt Lake City, Utah 84111

*Letter from Community Leaders to the UBCC in Support of Utah Clean Energy's and Salt Lake City's Joint Application to Incorporate Electric Readiness Provisions into the 2021 IECC*

Chairman Peterson and Members of the Uniform Building Code Commission:

On behalf of the signatories below, we offer our support for Utah Clean Energy's and Salt Lake City's joint application to amend the residential 2021 International Energy Conservation Code (IECC) to include electric-ready provisions.

“Electric readiness” empowers consumer choice in five key areas: home cooking, space heating, water heating, clothes drying, and electric vehicle ownership. The application *does not* require the installation of specific appliances—rather it empowers and protects consumer choice by making it simpler and much less expensive to install electric appliances in the future. Incorporating electric readiness into new construction allows homeowners, builders, and communities to budget for the electrification of homes and protects families from being burdened with costly retrofits to install electric appliances. Local analysis has found that making single-family homes “electric-ready” is **over 4 times less expensive** than retrofitting homes for electric-readiness after the fact.<sup>1</sup>

Electric readiness makes our communities safer. For example, recent research shows that the combustion of fossil fuels, such as natural gas, for cooking in our homes leads to negative health outcomes for families and communities.<sup>2</sup> The burning of fossil fuels indoors creates pollution linked to higher rates of asthma in children and other respiratory and cardiological illnesses in adults. In addition, these are the same pollutants that when emitted into our atmosphere contribute to poor outdoor air quality. “Area source” emissions, which includes our homes and buildings, are expected to become the dominant category of local air emissions by 2024.<sup>3</sup> Efficient use of electricity, which is increasingly being generated by pollution-free energy sources, like solar and wind power, represents a huge win for Utah communities. By making it easier to adopt electric appliances homeowners will protect Utah families and help conserve our airshed.

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<sup>1</sup> For more information see Utah Clean Energy's and Salt Lake City's memorandum about the proposed amendment.

<sup>2</sup> See <https://www.epa.gov/indoor-air-quality-iaq/sources-combustion-products>, see also <https://rmi.org/indoor-air-pollution-the-link-between-climate-and-health/>.

<sup>3</sup> Utah Division of Air Quality as reported by Heather May, The Salt Lake Tribune (2019): <https://www.sltrib.com/news/environment/2019/08/26/homes-are-big-part-air/>

Our communities need to be prepared for the transition from fossil fuel combustion to electricity, including at-home EV charging, 80% of which is expected to take place at home.<sup>4</sup> Amending Utah’s residential energy code with electric-ready provisions enhances consumer choice and sets our communities up for improved affordability when residents choose to use electric appliances. Rather than burden homeowners with prohibitively expensive and time-consuming retrofits, the proposed electric-ready energy code amendment will help ensure our communities are ready for future installations of at-home EV chargers, high-efficiency heat pumps, and electric ranges/ovens, and dryers.

The adoption of an electric-ready code during the 2021 code cycle is the logical next step in the modernization of our communities—there is no need to wait an additional six years for the next residential code cycle. Over the past few years, a number of all-electric buildings have been completed along the Wasatch Front by leading general contractors and each was more affordable than using a combination of gas and electric appliances. Moving to an electric-ready building code incentivizes all contractors, not just those comfortable with modern building technology, to be more productive with the same amount of capital.

In addition, the shift to electric-readiness unlocks tremendous value for utility customers. This value comes from the increased use of the electricity distribution grid while maintaining the same fixed costs. In essence, when we use the same utility infrastructure to serve more homes it can create downward pressure on utility rates, helping to keep Utah’s electricity rates low for Utah businesses and families.<sup>5</sup> The adoption of electric readiness standards is the first step to unlocking that potential value to customers.

In summary, adopting the proposed electric-ready code amendments will future proof new residential construction so that homeowners aren’t burdened with costly retrofits when installing an electric appliance in the future. Incorporating electric readiness into new construction will catalyze adoption of new clean air technologies and empower consumer choice. Adoption of the electric-ready code provisions will make it easier for Utahns to adopt combustion-free technologies and protect both indoor and outdoor air quality, while increasing the value of our utility system.

We urge you to approve the request to amend the residential 2021 International Energy Conservation Code, currently being reviewed for adoption in Utah, to include electric-ready provisions.

Thank you for your consideration of the proposed electric-ready energy code amendment.

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<sup>4</sup> See <https://www.energy.gov/eere/electricvehicles/charging-home>

<sup>5</sup> See, Eric Cutter et al., Energy+Environment Economics, Distribution Grid Cost Impacts Driven by Transportation Electrification, available at, [https://www.ethree.com/wp-content/uploads/2021/06/GridLab\\_2035-Transportation-Dist-Cost.pdf](https://www.ethree.com/wp-content/uploads/2021/06/GridLab_2035-Transportation-Dist-Cost.pdf), see also e.g., Order No. 88997 at 43, Public Service Commission of Maryland, <https://dms.psc.sc.gov/Attachments/Matter/8243954b-ffc4-4bb7-bbae-ff617c568b89> (agreeing in principle that “pairing EV adoption and EV charging with intelligent rate design can improve electric distribution system utilization and create downward pressure on rates through load management and system peak reduction.”)

Respectfully submitted on behalf of the undersigned,



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**Shellie Barrus**  
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