

**DOCKETED**

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*Comment Received From: Western Propane Gas Association*  
*Submitted On: 10/26/2019*  
*Docket Number: 19-BSTD-06*

**WPGA Comments Santa Monica 2019 Ordinance No. 2617**

*Additional submitted attachment is included below.*



October 25, 2019

David Hochschild, Chair  
California Energy Commission  
1516 Ninth Street, MS-32  
Sacramento, CA 95814  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)

**SUBMITTED VIA EMAIL**

**RE: Docket No. 19-BSTD-06: Santa Monica 2019 Ordinance No. 2617**

Dear Chair Hochschild and Commissioners:

Thank you for the opportunity to comment on the City of Santa Monica's proposed Reach Codes aimed at reducing greenhouse gas emissions in the building sector. The Western Propane Gas Association (WPGA) seeks to be a valuable contributor in both the development of these codes and the policies and procedures that may emerge as a result of these discussions.

While we applaud efforts for building decarbonization, WPGA believes that Reach Codes disincentivizing propane as a complementary fuel source to electric are fundamentally misguided. WPGA hopes that regulators will look to the example that the City of San Luis Obispo is setting with the development of their Reach Codes and recognize the value that propane provides on a number of levels.

Propane provides affordable, clean energy for low income communities as well as a vital back-up power for solar powered homes when battery power is low. Disincentivizing propane as a complementary power to solar has an unintended consequence to make solar homes more expensive and less reliable when power generation is not at peak levels.

Furthermore, there has been numerous discussions throughout California regarding planned power outages and safety black-outs. In a recent article published by Politico ([PG&E begins massive power shut-off in California to avoid wildfires](#)) it is noted that the Public Safety Power Shutoff could affect 2.4 million electricity users. Propane delivers energy resiliency for communities facing safety black-outs which can be critical for those powering life-sustaining equipment. Vulnerable citizens such as people on dialysis or simply the many individuals using electric powered wheelchairs can use propane energy for reliable power.

When looking towards the future, our industry is investing in renewable propane, derived from sustainable sources like beef tallow or vegetable oil. We hope that regulators take a more holistic view of the complementary role propane plays alongside decarbonization efforts including solar, wind and other renewable fuels.

The Western Propane Gas Association appreciates your work in this area and looks forward to working with you as the State strives to reduce greenhouse gas emissions through comprehensive clean energy solutions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Granholm", is written over a light blue horizontal line.

Ben Granholm  
Regulatory Affairs Specialist