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Natural Gas Distribution in California's Low-Carbon Future

This report by E-3 sheds important light on the issues facing the use of residential natural gas relative to the state's goals for decarbonization. The following are simply a few comments that might be addressed further.

1. The report rightly addresses the potential impacts of electrification on disadvantaged communities as more affluent NG clients transition leaving behind those who may not be able to afford to do so. However, at this point, electricity providers will be implementing Time of Use pricing which is likely to affect those same communities adversely. Currently NG is far less expensive than electricity. Such pricing may create a double whammy for those communities, and should be acknowledged in the report.
2. Since electricity is more costly than NG, it is not entirely accurate to say that electrification appears to be a cost-effective strategy for some customers today -- it may be, but under what circumstances needs to be better defined.
3. The report states that there is efficiency associated with building electrification. This assumption needs further defining -- what is creating the efficiencies?
4. The report assumes no increase in AC. This is clearly a limitation of the model, as the authors acknowledge, but turns out to be very important and could mean the need for a great deal more electricity generation than the model calculates.
5. The cost of household electrification will need to be subsidized, especially in DAC communities. While this may be out of the scope of this study, where funding will come from needs to be identified.
6. The discussion of cost shift allocation toward industrial users was excellent.