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**WPGA Letter RE Docket No. 10-BSTD-03 2022 Energy
Electrification Workshop - 12.22.20**

Additional submitted attachment is included below.



December 22, 2020

Mazi Shirakh, PE: Building Decarbonization Lead
California Energy Commission
1516 Ninth Street, Docket Office, MS-4
Sacramento, CA. 95814
docket@energy.ca.gov

SUBMITTED VIA EMAIL

Re: Docket Number 19-BSTD-03 – CEC 2022 Energy Code Electrification Workshop

Dear Mr. Shirakh and staff:

Thank you for the opportunity to comment on the December 8th staff workshop regarding the 2022 Energy Code and electrification. The Western Propane Gas Association (WPGA) seeks to be a valuable contributor in both the development of the code update and the policies and procedures that may emerge as a result of these discussions.

WPGA would like to emphasize that we support decarbonization efforts that take a comprehensive approach toward providing consumers with diverse clean-energy solutions and low-carbon fuel options. In that respect, we appreciate the recognition that an all-electric baseline in the 2022 Energy Code, will disproportionately impact a number of communities including rural communities, those who live off the grid, low-income communities, and those experiencing electric utility power disruption.

During the December 8th workshop comments were delivered suggesting Californians generally want to move toward electrification, referencing the number of municipalities that have already done so. However, this argument fails to acknowledge that the number of municipalities that have done so reflect only 1.5% of new home construction in California; instead, mostly wealthy coastal communities, failing to reflect the perspectives of the state as a whole.

The propane industry is proud of the longstanding role it has played in providing an affordable, clean energy source found in virtually all California communities. Importantly, propane with its extremely low Global Warming Potential (GWP) is notably different from methane, providing residents with a reliable, safe energy source. This is particularly true in rural areas that comprise the great majority of California's landscape, and often with propane costing less on a "work performed" or btu basis than electricity. And with the advent of renewable propane derived from sustainable sources such as used cooking oil or animal fats, propane's value proposition for California consumers will only increase. This is critically important when viewing any home energy source from a full life cycle perspective, that includes energy generation and transmission, in addition to site use.

Propane provides power to firefighters' basecamps so they can cook, clean and shower. Propane similarly provides backup power to cell phone towers, hospitals, water treatments plants, homeless shelters, and other facilities that are critical to many Californians during these unfortunate events. Propane energy translates to clean energy security.

WPGA supports decarbonization efforts that focus on emissions reduction targets, not the energy source. Solar powered homes with propane complimentary power is just one example for how an energy-source agnostic approach can yield consumer benefits. Further, WPGA has issued a sustainability statement for 100% renewable propane in California by 2030. WPGA believes that any decarbonization strategies pursued by the CEC must

ensure that residents across the State have much-needed access to clean, diverse, and resilient energy options--none of which can be universally met by relying solely on all-electric homes and equipment.

WPGA has received countless testimonials from residents who were able to power their homes, stay warm, and ensure that essential life sustaining equipment was not turned off during unintentional electricity blackouts, wildfires, and PSPS events---because their homes were equipped with propane.

In terms of cost, we encourage the CEC to re-evaluate the forecasted pricing used to model cost efficacy. Specifically, the impact electrification will have on ratepayer utility bills. In the majority of climate zones in California, homeowners will face increased utility bills under an electric-only solution; these are expected to range from around \$250 per year in the Central Valley to hundreds more in heating-dominated climate zones. Most rate payers in California, then, will face substantial increases in electric rates over the next 3 years, at 10% or more per year in many cases---and without argument any increase in utility bills means an automatic increase in California housing costs where construction-, purchase, and rental-costs, along with an essential shortage of housing, are already among the most extreme in the state.¹

As the CEC and State continue to develop building decarbonization strategies and regulations, WPGA hopes that the Commission and staff recognize in particular the role that propane does and that renewable propane will play in reducing greenhouse gas emissions in the building sector, and we encourage staff to review the attached list of select unsolicited testimonials provided by California propane users who routinely rely on propane for cooking, hot water, space heating, and emergency backup generator fuel---and who were not left stranded during the recent blackouts or PSPS events.

In closing, the Western Propane Gas Association appreciates your work in this area. We look forward to working with you as the State strives to reduce greenhouse gas emissions through continued application of a comprehensive approach to clean, safe, reliable, and secure energy solutions for California's diverse communities and citizens.

Sincerely,



Ben Granholm
Regulatory Affairs Specialist

¹ Southern California Gas letter to the CEC, August 7, 2020

Select Testimonials

Caryn Tognozzi – *“We live in rural Santa Rosa and rely heavily on our access to propane for our major appliances and hot water. We do not have the option of natural gas, as the companies that provide that will not bring service to our area. So, for us to go all electric would create undue financial hardship as we are on limited fixed income. Please do not consider all-electric as a benefit, as it would be disastrous to us.”*

Carolyn Steele – *“I am a homeowner who uses propane for my appliances. I would like to speak on why we should continue to have the choice for clean gas energy, such as propane, in our homes. We live in Butte County- which as you know has been severely impacted by Wildfires in past years. Since the Camp Fire in 2018 we’ve had frequent electric blackouts to prevent wildfires, with two already this season that each lasted for 3 days. I’ve always been so thankful that I have propane, since although there is no electricity, I’m still able to cook, heat water, and keep warm.*

Changing to all-electric would be costly and leave many of us in rural areas with no power in emergencies, creating a dangerous situation for residents. If the solution is battery power during blackouts, think again: Battery power is too expensive to provide reliable back-up power. I do have solar panels, but they would do me no good during power outages as their electricity is run to and then through the electric grid. We chose propane for its fuel efficiency, low cost, and reliability.”

Jennifer Pina – *“Eliminating home access to propane would create a definite hardship at my residence. Not only do my hot water heater and stove operate on propane, but so does my whole-house emergency back-up generator. I’ve just experienced a four-day power outage: the propane-fueled generator made it possible for my freezer and refrigerator to function.”*