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*Comment Received From: Rob Koslowsky  
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Docket Number: 19-BSTD-03*

## **CalPa Hijacked by Environmentalists**

To Whom It May Concern:

For Docket #: 19-BSTD-03 Project Title: 2022 Energy Code Pre-Rulemaking

About 86 percent of all the homes in California use natural gas and another five percent use propane. Banning the direct use of the fuel for cooking, home heating, water heaters, and clothes dryers, will force consumers to instead use more electricity which, on an energy- equivalent basis, costs four times as much as natural gas, Robert Bryce reported in Forbes on December 15, 2020 (California's Natural Gas Bans Are Drawing Fire From Black And Latino Leaders). That's an unconscionable energy tax in California, which has the highest poverty rate of any state in America.

Please repeal the 2019 Building Code making all-electric residential construction a mandate. Furthermore, all-electric mandates should not be made jointly with all-electric automobile (EV) mandates in order to force nighttime charging just to maintain the state's electric grid. Therefore, mandatory battery backup systems should not be included in the proposed 2022 Building Code.

Resiliency, choice, flexibility, and safety are best served by allowing residents to enjoy the services of natural gas, gasoline, and electric. The attached April 26, 2021 submission reflects some of the reasons to repeal the EV mandate, forestall any natural gas bans, and exclude mandates for both all-electric construction and proposed residential battery systems " CalPa Hijacked by Environmentalists\_RKK\_April 26 2021. If CalPa won't protect consumers, who in Sacramento will?

Thank you for your consideration,  
Rob

*Additional submitted attachment is included below.*

## **Another Government Agency Hijacked by Environmentalists**

**“As home prices go up, then folks who rent those homes have to pay more. Or people are pushed out of homeownership and into the rental market.”**

**– Jenni Klose, executive director of Generation Housing, *The Press Democrat*, April 15, 2021**

**“Blessed are the meek: for they shall inherit the earth.”**

**– Matthew 5:5**

I heard the biblical phrase, “Blessed are the meek . . .” on a recent television show. It brought to mind images of Californians going about their lives and their business in spite of the pandemic. People are rarely whipped into a frenzy and they are not, as the Matthew 5:5 verse infers, “easily provoked to anger; who patiently bear, and put up with injuries and affronts . . .” [1]

Many members of our political leadership and certainly a number of members of the Sierra Club do not fit this category. They are not humble, but rather quite aggressive in pushing their global warming agenda. Many of them are angry people who lash out at dissenters seeking to discuss the facts associated with resiliency and lower energy costs.

An example of one hidden agenda item is the Sierra Club’s aggressive co-opting of state government to try and ban natural gas use. In December 2020, it was brought to light that the California Public Advocates Office (CalPA) joined forces with the Sierra Club. CalPA is an agency that is supposed to be responsible for looking out for the state’s energy consumers, a charter that the Sierra Club does not subscribe to. Last year, as Robert Bryce discovered [2], “CalPA signed — but did not publicly disclose — a ‘common interest agreement’ with the Sierra Club to investigate ‘tactics by Southern California Gas Company to perpetuate reliance on gas in buildings’ and whether the utility tried to undermine new efficiency codes.”

It’s becoming clear that CalPA is not looking out for consumers or their need for lower energy costs. This co-opted agency “now wants state regulators to levy a \$255 million fine against SoCalGas, the largest residential supplier of natural gas in the United States.” It’s an aggressive move made by a state agency that has been infiltrated by Sierra Club influencers.

Who pays? Natural gas customers end up paying.

## Homeowners Targeted with Unwarranted State Over-reach - “All-Electric” Reach Code, Natural Gas Bans



**Politicians**  
(Newsom, CEC, BSC)

**Homeowners**  
**Renters**

**Aggressive Activists**  
(and “eager” municipalities)

Shutterstock image, Graphic by R.K. Koslowsky

Bryce dug deeper. He talked with Mike Campbell, a program manager at CalPA who told him that SoCalGas was engaged “in various lobbying campaigns and they charged those lobbying costs to ratepayers” rather than to shareholders.

Bryce also reached out to Timothy Simon, the chairman of the California Black Chamber of Commerce, and a former member of the California Public Utility Commission (CPUC). Simon said that CalPA’s “mission is very clear: keep costs low.” Gas, he said, is a cheaper energy source than electricity [3]. Despite that fact, he said, “CalPA has joined an environmental group that doesn’t give a rat’s ass about the consumer.”

Simon made his concerns public with a December 3 letter submitted to the CPUC. He pointed out that the deal between CalPA and the Sierra Club “is not only irresponsible but violates the very notion of the utility regulatory framework.” He also said, “The Sierra Club does not bear the CPUC’s burden of safe and cost-efficient energy on demand, better known as default obligation of delivery. Yet, they partner with the independent government entity entrusted to protect ratepayers with no historical concern of energy cost.”

This is more bad government policy run amok, where policies are written in back rooms for state agencies and promulgated by aggressive activist organizations like the Sierra Club. No one, it seems, is protecting hard-working residents from being targeted by these environmental clubs with their own “religious” agenda. Homeowners continue to be targets. Apartment dwellers continue to suffer as energy prices climb. And all Californians

suffer with higher costs of living associated with growing mortgages and rents and the high cost of utilities needed to service them.

About 86 percent of all the homes in California use natural gas and another five percent use propane. “Banning the direct use of the fuel for cooking, home heating, water heaters, and clothes dryers, will force consumers to instead use more electricity which, on an energy-equivalent basis, costs four times as much as natural gas,” Bryce reports. “That’s an unconscionable energy tax in California, which has the highest poverty rate of any state in America.”

California legislators, two of who wrote to the CPUC last year, are concerned that environmental groups, like the Sierra Club, don’t care about the plight of residents, “More importantly, it appears their belief is cost increases should not be a determining factor with regard to approval of new energy policies because the need to address climate change trumps all concerns that might arise. [4]”

Both Assemblyman Jim Cooper, a Democrat from Elk Grove [5], and Assemblywoman Blanca Rubio, a Democrat from the Los Angeles area, are strongly against “the growing ‘ban natural gas’ chorus from organizations such as the Sierra Club, the Environmental Defense Fund (EDF) and Union of Concerned Scientists to name a few.” Their tactics have “become more aggressive, and there has never been a mention by them about what the cost impacts would be on customers who are struggling with utility costs, and household expenses.”

Maybe its time state government performs its job and protects its residents from soaring energy costs and stops listening to the unreasonable and aggressive demands of aggressive activists. Their cause has become their obsession and such zealots believe consequences be damned!

Meanwhile, Californians are targeted with impunity as more and more of our state agencies add arrows to the activists’ quivers.

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**“SoCalGas is fighting these bans, as are homebuilders, realtors and commercial real-estate groups, which noted in a public comment to the Energy Commission that ‘in a survey conducted just two years ago, over 70% of the respondents indicated they would NOT want a home with an electric stove.’”**

**- Now We’re Cooking With Gas. But Tomorrow? - The Sierra Club hijacks a state agency in an effort to force Californians to use electric stoves and ovens, Allysia Finley, WSJ, Dec 16, 2020**

**“Energy demand that is not met by clean energy is satisfied by fossil fuels – coal, oil and natural gas. In reality, clean energy supply is not a perfect substitute for fossil fuel . . .”**

**- Energy Demand: Q-series, UBS, March 25, 2021, p.10**

**“While Democrats in Congress point to extreme weather events as justification for subsidizing renewables, the blackouts in California and Texas, and conversely the**

**maintenance of fossil fuels and renewables slowdown in Germany, suggest that anybody concerned about preventing blackouts and their brutal financial and human costs should favor relying less, not more, on weather-dependent energies.”**

**- Michael Shellenberger, *Forbes*, April 20, 2021**

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[1] Matthew 5:5: Blessed are the meek for they will inherit the earth. “The meek are not easily provoked to anger; who patiently bear, and put up with injuries and affronts . . . carry themselves courteously, and affably to all; have the meanest thoughts of themselves, and the best of others; do not envy the gifts and graces of other men; are willing to be instructed and admonished, by the meanest of the saints; quietly submit to the will of God, in adverse dispensations of providence; and ascribe all they have, and are, to the grace of God. Meekness, or humility, is very valuable and commendable.”

[2] California’s Natural Gas Bans Are Drawing Fire From Black And Latino Leaders, Robert Bryce, *Forbes*, December 15, 2020.

[3] Electricity is four times the cost of natural gas for domestic use in California. It’s a figure that homeowners like me have oft quoted during our discussions with local policymakers. Household utility rates are as follows: Gas costs range from \$1.60 - \$2.14/therm, with a PG&E procurement cost \$0.48/therm. Electric rates range from \$0.24 - \$0.31/kW in a three-tier system, with an equivalent cost of \$9.00/therm.

[4] New Buildings Institute (NBI) also acts like the Sierra Club in promoting all-electric appliances no matter the cost. I recently wrote to one of NBI’s directors, “You’re simply replacing one electric water heater with a more modern electric water heater and claiming all-electric superiority for heat-pump water heater technology, based solely on efficiency. Neither one of these electric-based water heaters are as functional or capable as a natural gas water heater. Cathy Higgins, Research Director, NBI, confirmed for me on August 25, 2020 that electric, heat-pump, water heaters are being forced on new home construction because of concerns over carbon dioxide in the atmosphere. She told me, “I do understand the cost-effective complexities and it is not our position to say HPWHs are currently cost-effective, but rather to prompt and prepare for the technology needs to meet improved efficiency targets over electric resistance [water heaters] and decarbonization targets over [natural gas water heaters].” It turns out, heat-pump water heaters are *not* more cost-effective. As legislators are finding out, rising energy costs are not important to environmentalists or many government agencies who have adopted their cause.

[5] Jim Cooper has become one of the harshest critics of California’s climate policies and the environmental groups that are pushing them.