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WPGA Response to Initial Workshop for the Non-Energy Impacts (NEI) Informational Proceeding

Additional submitted attachment is included below.

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October 21, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814
VIA ONLINE SUBMISSION

RE: Initial Workshop for the Non-Energy Impacts (NEI) Informational Proceeding

The Western Propane Gas Association (WPGA) is pleased to submit its comments in response to the Initial Workshop for the NEI Informational Proceeding that took place on October 7, 2024.

NEI INCLUSION WOULD CREATES DUPLICATIVE MANDATES ACROSS GOVERNMENT

While we remain concerned that the expansion of inclusion of NEI into California Energy Commission (CEC) rulemakings may constitute a breach of CEC's statutory authority, we are certain that such inclusion will unnecessarily duplicate regulatory schemes already in place at air regulatory bodies, including regional air districts and the California Air Resources Board (CARB). State air regulators are already considering impacts regarding outdoor air quality and indoor air quality (IAQ) in numerous rulemakings. Inclusion of IAQ within CEC rulemakings would create confusion within the marketplace for compliance entities and manufacturers.

PRESENTERS MISREPRESENTED FEASIBILITY OF TRACKING IAQ

A presentation by PSE Healthy Energy (PSE) suggests that "indoor air quality" should be part of the metric for evaluating NEI, listing it as a "sub-factor" as part of the larger "factor" of "public health and air quality." Initial Workshop for the Non-Energy Impacts Informational Proceeding (ca.gov), Presentation for Non-Energy Impacts OIIP Kickoff Workshop, at Slides 55, 58 (PSE Presentation). PSE acknowledges that the "sub-factor" of indoor air is affected by multiple sources, unlike the other three sub-factors which are designated for specific sources for outdoor air (electricity generation, transportation and "end use"). PSE nevertheless lumps these four sub-factors together in suggesting that for "key challenges" for using "Public Health and Air Quality" as an NEI metric, there is an "improved resolution" using census tracts. The suggestion that IAQ or purported impacts related to IAQ can be compared across census tracts was rejected by the majority of parties commenting on the issue in the Public Utilities Commission proceeding on decommissioning the gas system.[1] Parties, including the Sierra Club, agreed that using IAQ as a metric is not practical or effective because there are not sufficient historical data, no state or federal IAQ standards, and no practical way to measure and track this highly variable and individual information.[2] The same is true here, and indoor air quality should not be considered as a "sub-factor" for examining NEI across census tracts.

[1] *See* California Pub. Util. Comm'n, Order Instituting Rulemaking to Establish Policies, Processes, and Rules to Ensure Safe and Reliable Gas Systems in California and Perform Long-Term Gas System Planning, R 20-01-0078.
[2] *See, e.g.,* Sierra Club, California Environmental Justice Alliance, and Natural Resources Defense Council Opening Comments on Administrative Law Judge's Ruling Directing Parties to File Comments on Staff Gas Infrastructure Decommissioning Proposal at 13-14 ("Given information gaps on indoor air quality on a census track basis, attempting to distinguish communities based off indoor air quality is unlikely to be effective."); Pacific Gas And Electric Company's Opening Comments On Administrative Law Judge's Ruling Directing Parties To File Comments On Staff Gas Infrastructure Decommissioning Proposal at 27-28 ("Indoor air quality lacks consistency in measurement and historical data."); Comments of Southwest Gas Corporation (U 905 G) on Staff Gas Infrastructure Decommissioning Proposal at

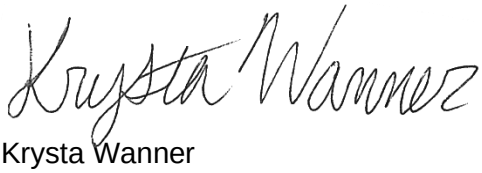
PRESENTERS MISREPRESENTED VOC CONCENTRATIONS & THEIR IMPACTS

PSE also asserts that "Gas stoves can create benzene concentrations comparable to secondhand smoke." PSE Presentation at Slide 62. This suggestion is misleading. There is not sufficient evidentiary support for the suggestion that potential gas leaks in homes normally result in benzene levels, a volatile organic compound (VOC), in indoor air that would exceed health-based guidelines, or that there are any significant health impacts associated with such exposures. Similarly, studies have not shown that benzene air concentration levels associated with gas stove use routinely exceed California health-based guidelines.[3] The comparison to secondhand smoke is misleading, when the reported levels of benzene associated with secondhand smoke are no different than average (median) indoor benzene concentrations throughout the United States, Canada, and other countries.[4] Benzene is a common constituent of indoor air and has multiple sources. PSE's statement, which appears intended to create the implication of harm, ignores the significance of exposure and dose and the absence of any documented health impacts from benzene associated with gas stove use. More generally, the suggestion that gas stove emissions are associated with adverse health impacts, particularly respiratory impacts on children, is not supported by sufficient evidence – as demonstrated by a recent WHO-funded study published in *The Lancet* that found, compared to electric, "using gas for cooking or heating *did not result in a higher risk estimate for asthma in children*."[5]

CONCLUSION

In short, no scientific basis and no practical means have been provided for including "indoor air" as a sub-factor in metrics for NEI. We thank you for your consideration of these comments.

Sincerely,



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Ex. A pp. 5-6; Comments of Environmental Defense Fund on Staff Gas Infrastructure Decommissioning Proposal at 11.

[3] A recent study found that benzene air concentration levels from gas and induction cooking in a controlled experiment were not substantially different, calling into question earlier suggestions that gas stove use produced benzene levels of concern. *See* Li, J., H. Zhao, M.L. Russell, W.W. Delp, A. Johnson, X. Tang, I.S. Walker, and B.C. Singer. 2024. Air pollutant exposure concentrations from cooking a meal with a gas or induction cooktop and the effectiveness of two recirculating range hoods with filters. Indoor Environments. Vol.1. Issue 4. December.

[4] *See* Logue, J.M., T.E. McKone, M.H. Sherman, and B.C. Singer. 2011. Hazard Assessment of Chemical Air Contaminants Measured in Residences. *Indoor Air.* 21:92−109.

[5] E. Puzzolo, N. Fleeman, F. Lorenzetti, F. Rubinstein, Y. Li, R. Xing, G. Shen, E. Nix, M. Maden, R. Bresnahan, R. Duarte, L. Abebe, J. Lewis, K. N. Williams, H. Adahir-Rohani, D. Pope, Estimated health effects from domestic use of gaseous fuels for cooking and heating in high-income, middle-income, and low-income countries: A systematic review and meta-analyses. Lancet Respir. Med. 12, 281-293 (2024) (finding also that prior studies may have overstated any association based in part on "confounding from exposure to tobacco smoke, ambient air pollution, or socioeconomic status."). *See also* W. Li, C. Long, T. Fan, E. Anneser, J. Chien, and J. Goodman, 2023, Gas Cooking and Respiratory Outcomes in Children: A Systematic Review, Global Epidemiology, at 2 (conducting a systematic review of studies examining gas stoves or NO_2 and childhood asthma or wheeze and finding there was insufficient evidence of a causal relationship); Wong, GW; Brunekreef, B; Ellwood, P; Anderson, HR; Asher, MI; Crane, J; Lai, CK; ISAAC Phase Three Study Group. 2013. Cooking fuels and prevalence of asthma: A global analysis of phase three of the International Study of Asthma and Allergies in Childhood (ISAAC). *Lancet Respir. Med.* 1(5):386-394. doi: 10.1016/S2213-2600(13)70073-0) (finding no significant association of gas stove use with childhood or lifetime asthma).