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SoCalGas Comments on CEC Non-Energy Impacts & Social Costs OIIP Workshop

Additional submitted attachment is included below.

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October 21, 2024

Vice Chair Siva Gunda
California Energy Commission
Docket Unit, MS-4
Docket No. 24-OIIP-03
715 P Street
Sacramento, CA 95814-5512

Subject: Comments on the CEC Workshop on Non-Energy Impacts & Social Costs OIIP

Dear Vice Chair Gunda,

Southern California Gas Company (SoCalGas) appreciates the opportunity to provide comments on the California Energy Commission (CEC) Workshop on Non-Energy Impacts & Social Costs Order Instituting Informational Proceeding (OIIP) held on October 7, 2024.

The workshop consisted of a range of presentations from various community-based organizations (CBOs), with no formal presentation by CEC staff.[1] It is unclear how the information presented by invited presenters will be used in the OIIP. It is also unclear how the presented information will be utilized beyond the OIIP and if utilized in other proceedings, how the CEC plans to incorporate the presented information and into which proceedings. A presentation from the CEC at a future OIIP workshop outlining the analysis process the CEC staff plan to use, and the milestone dates, would be beneficial for the public.

It is likewise in the public interest to have a broad perspective of presenters so the public record on this important topic is robust. CEC requested stakeholders to comment on the speakers' presentations, however, the invited speakers did not represent diverse and comprehensive viewpoints on these complex topics. For example, PSE Healthy Energy (PSE) presented proposed

[1] CEC Workshop on Non-Energy Impacts & Social Costs OIIP, October 7 2024, available at: https://www.energy.ca.gov/event/workshop/2024-10/initial-workshop-non-energy-impacts-informational-proceeding.

metrics for non-energy impacts, including a reference to indoor air quality (IAQ).[2] While SoCalGas supports efforts to improve IAQ, limiting the discussion on this topic to one presentation by PSE does not provide a balanced perspective on the complex issue. In the spirit of providing additional useful information to the OIIP docket, SoCalGas is submitting the following studies funded by the United Nations (U.N.) World Health Organization (WHO), and United States Environmental Protection Agency (U.S. EPA) and U.S. Department of Energy (DOE):

1) The WHO, a government body established by the U.N. to protect public health, funded a study conducted by WHO scientists and academic researchers regarding the use of various fuels globally for cooking and heating. The April 2024 WHO-funded study performed a meta-analysis (116 studies) that not only researched the health impacts of indoor cooking and heating using gas, but also compared these findings to the use of electricity and other fuels.[3] The study found no significant association between natural gas and asthma, wheeze, cough or breathlessness.[4] SoCalGas is submitting the WHO study for the public record and recommends that the CEC invite the WHO to present its findings if the CEC plans to host additional workshops that address IAQ.

2) The U.S. EPA and DOE funded a study of emissions from cooking with gas and induction stoves conducted by scientists at Lawrence Berkeley National Laboratory (LBNL), for which results will be printed in *Indoor Environments* in December 2024.[5] The study found that monitored benzene concentrations were comparable for both gas and induction stoves, with the highest concentration using either type of cooktop and no range hood approximately 0.2 parts per billion (ppb), and estimated 1-hour average concentrations approximately 0.1 ppb. These values are well below the California 1-hour health-based guideline of 8 ppb.[6] As such, these results call into question an earlier cooking study conducted by PSE that identified benzene emissions from gas burners as significantly greater than those from electric or induction burners.

Thank you for your consideration to expand and balance the record by including these two government-funded research reports.

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[2] In additional to statements about IAQ, PSE's slides suggest that fire department costs should be considered when determining the non-energy impacts of natural gas infrastructure. If these categories of costs are to be considered, that analysis must also consider the costs to fight wildfires sparked by electric lines and the environmental impact of those wildfires.

[3] Lancet Respiratory Medicine Journal. 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, April 2024.

[4] *Ibid.*, pg. 290.

[5] 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. The study also found that while nitrogen oxides (NOx) emissions for cooking using gas stoves are higher than those for induction stoves, one-hour average nitrogen dioxide (NO_2) concentrations would not have exceeded the federal 1-hour National Ambient Air Quality Standards (NAAQS) short-term standard of 100 ppb, a health-protective standard.

[6] California Office of Environmental Health Hazard Assessment 1-hour Reference Exposure Level.

Respectfully,

/s/ Kevin Barker

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