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General Comments

General points to consider from myself not from my company

The CEC should keep an open mind about how to achieve building decarbonization goals.

Focusing on electrification only is extremely limiting.

And when you limit your options, you limit the future.

Electrification is costly, disruptive, will stifle innovation and negatively impact consumers and businesses.

A more inclusive approach that leverages multiple energy resources would avoid these problems. Californians are better served by balanced decarbonization policies that rely not only electricity, but also on renewable natural gas, hydrogen, natural gas and fuel cells.

Business perspective points to consider:

Many businesses currently rely on high-efficiency natural gas equipment to cost-effectively run their operations.

They have invested in this equipment to comply with stringent air quality and emissions regulation.

Electrification would force businesses to replace their gas equipment with electric equipment at substantial expense.

Some businesses, like restaurants, which operate on extremely narrow profit margins, will simply be unable to do so.

Other businesses, like those that require natural gas for thermal processes, could be forced out of state.

As you consider implementing decarbonization policies, please keep in mind that sustainability is not just about the environment.

It is also about sustainability of jobs, sustainability of communities and sustainability of the economy.

Rather than mandating a narrow pathway to decarbonization, I urge you to take a more balanced approach that allows for multiple technologies and multiple fuels to compete.