

DOCKETED

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WPGA Comments on Energy Efficiency and Building Decarbonization

Additional submitted attachment is included below.



September 18, 2019

David Hochschild, Chair
California Energy Commission
1516 Ninth Street, MS-32
Sacramento, CA 95814

SUBMITTED VIA EMAIL

RE: Docket No. 19-IEPR-06: 2019 California Energy Efficiency Action Plan and Building Decarbonization Workshops

Dear Chair Hochschild and Commissioners:

Thank you for the opportunity to comment on the 2019 California Energy Efficiency Action Plan and Building Decarbonization Workshops. The Western Propane Gas Association (WPGA) seeks to be a valuable contributor in both the development of this report and the policies and procedures that may emerge as a result of these discussions.

WPGA would like to emphasize that while we applaud decarbonization efforts, we believe that the Commission should take a comprehensive approach toward providing consumers with clean energy solutions and low carbon fuel options. Clean energy solutions should not have to compete with each other, when so many easily complement one another. For example, propane provides a low cost, near-zero emission fuel for communities as well as a vital back-up power for solar powered homes when battery power is low.

We are also happy to see the implementation of SB 1477 (Stern, Chapter 378, Statutes of 2018) through the BUILD and TECH programs. WPGA hopes that funding through these programs will be allocated to projects that will reduce building emissions in both the short and long-term, such as:

- Solar-propane mixed-fuel buildings and homes;
- High efficiency appliances, such as tankless water heaters or refrigerators;
- Production and use of renewable propane; and
- Propane backup generators to provide energy resiliency.

As mentioned above, when looking towards the future, our industry is investing heavily in renewable propane, derived from sustainable sources like beef tallow or vegetable oil. We hope that regulators take a more holistic view of the complementary role propane plays alongside decarbonization efforts including solar, wind and other renewable fuels.

The Western Propane Gas Association appreciates your work on this report and looks forward to working with you as the State strives to reduce greenhouse gas emissions through comprehensive clean energy solutions.

Sincerely,

Ben Granholm
Regulatory Affairs Specialist

cc: Janea Scott, Vice Chair
Karen Douglas, Commissioner
J. Andrew McAllister, Ph.D., Commissioner
Patty Monahan, Commissioner
Bryan Early, Chief of Staff
Raquel Kravitz, 2019 IEPR Project Manager