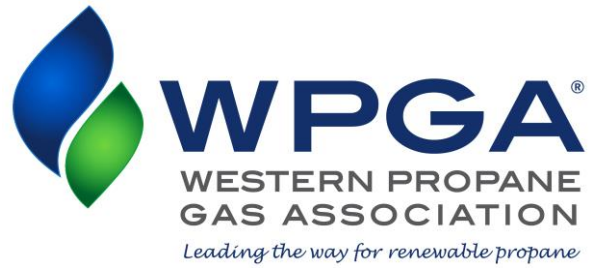


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January 10, 2020

David Hochschild, Chair
California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

SUBMITTED VIA EMAIL

RE: Docket No. 19-DECARB-01 Building Decarbonization Assessment

Dear Chair Hochschild and Commissioners:

Thank you for the opportunity to comment on the Building Decarbonization Assessment (Assessment). The Western Propane Gas Association (WPGA) seeks to be a valuable contributor in both the development of this assessment 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.

The propane industry is proud of the role we play in providing an affordable, clean energy for communities across California. Propane is not a greenhouse gas. Propane provides residents with a reliable, non-toxic energy source at a cheaper rate than electricity. Renewable propane has also dramatically changed propane's value proposition. As the CEC continues to develop building decarbonization strategies, WPGA hopes that the Commission will recognize the role that both propane and renewable propane can play in reducing greenhouse gas emissions in the building sector.

While not directly related to the proposed Assessment, WPGA has concerns with the cost effectiveness study that the CEC has provided to a number of local cities across California looking to adopt Reach Codes. The data in the study we have seen thus far does not appear to calculate the true cost of plumbing a house with propane. We ask the CEC provide more details on the cost estimates for the uses when calculating the expense to plumb a home with propane. We also request further details regarding the CO₂ emissions associated with the 'other fuels' in the presentation provided in December. Our industry experts stand ready to help provide relevant inputs to ensure the CEC identifies the most cost-effective pathway to reduce greenhouse gas emissions. If the costs for all sectors are not analyzed in the study, it is impossible for local cities or the State to deem these efforts as truly "cost effective." There is no substantial cost differential between building with propane in comparison to electric, especially once you factor in the cost of the energy.


Over the past couple months, we have seen millions of Californians left in the dark and cold due to Public Safety Power Shut Offs. These occurrences, which are expected to continue for at least the next 10 years, are a prime example as to why relying on a single power source is unacceptably risky and accentuate the need for both energy diversity and resiliency across the state. Whereas, countless individuals were able to

power their homes, stay warm and ensure that essential life sustaining equipment was not turned off during the shut offs because their homes were also plumbed with propane. We believe the Assessment should ensure that residents across the state have much needed access to both clean energy diversity and resiliency.

Climate change and decarbonization is a complex challenge that requires deployment of all clean energy sources. Wind, solar, and other renewable fuels – like renewable propane – all have to factor in the equation of how to combat one of the most critical issues of our time.

The Western Propane Gas Association appreciates your work on the proposed Assessment and hope the Commission and staff take a more holistic view of the complementary role propane plays alongside decarbonization efforts including solar, wind and other renewable fuels.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Granholm". The signature is fluid and cursive, with a large initial "B" and a long, sweeping tail.

Ben Granholm
Regulatory Affairs Specialist

cc: Heriberto Rosales
Nicholas Janusch