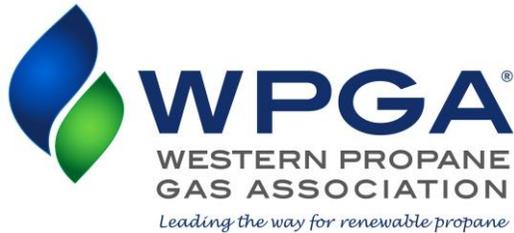


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Project Title:	Local Ordinances Exceeding the 2019 Energy Code
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WPGA Comments Docket No 19-BSTD-06 - Local Ordinance Applications

Additional submitted attachment is included below.



March 9, 2020

David Hochschild, Chair
California Energy Commission
1516 Ninth Street, MS-32
Sacramento, CA 95814
docket@energy.ca.gov

SUBMITTED VIA EMAIL

RE: Docket No. 19-BSTD-06 Local Ordinance Applications

Dear Chair Hochschild and Commissioners:

Thank you for the opportunity to comment on the local Reach Codes proposed for the cities of Cupertino, Mill Valley, Pacifica, San Francisco, San Rafael, and Saratoga. The Western Propane Gas Association (WPGA) seeks to be a valuable contributor in both the development of these codes and the policies and procedures that may emerge as a result of these discussions.

WPGA has concerns with the cost effectiveness study that a number of local jurisdictions across California are using to adopt these 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. There is no substantial cost differential between building with propane in comparison to electric, especially once you factor in the cost of the energy. Cost effectiveness is extremely important when you look at the role propane plays today in providing energy to low-income and disadvantaged communities. If the costs for all sectors are not analyzed in the study, it is impossible for local jurisdictions or the State to deem these efforts as truly “cost effective.”

While we applaud efforts for building decarbonization, WPGA believes that Reach Codes disincentivizing propane as a complementary fuel source to electric are fundamentally misguided. WPGA hopes that regulators will look to the example that the City of San Luis Obispo is setting with the development of their Reach Codes and recognize the value that propane provides on a number of levels. We believe that both local jurisdictions and the Commission should take a comprehensive approach toward providing consumers with clean energy solutions and low-carbon energy options based on a full energy cycle.

The propane industry is proud of the role we play in providing an affordable, clean energy for communities across California. Propane provides residents with a reliable, non-toxic energy source at a cheaper rate than electricity. The advent of renewable propane has also dramatically changed propane’s value proposition. As the Commission continues to develop building decarbonization strategies, WPGA hopes that local jurisdictions and the Commission will recognize the role that both propane and renewable propane can play in reducing greenhouse gas emissions in the building sector.

In a recent report entitled, “[Optionality, Flexibility & Innovation: Pathways for Deep Decarbonization in California](#)” by the [Energy Futures Initiative](#), Dr. Ernest Moniz, a former U.S. Energy Secretary under President Obama, makes it very clear throughout the report that, “there is no technology silver bullet to achieve economywide decarbonization in California,”¹ and concludes that, “To meet its decarbonization

¹ Ernest J Moniz, “Optionality, Flexibility & Innovation: Pathways for Deep Decarbonization in California,” May 2019, pp. 27-28,

priorities over the long-term, California should expand its investments in its already-robust clean energy innovation ecosystem.” A general consensus among the report is that all low-carbon energy solutions must be deployed today, which includes low-carbon gaseous fuels such as renewable propane. An example of this is how propane complements solar powered homes, providing energy when battery power and generation is not at peak levels.

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. Cities are looking to propane to provide clean energy back-up power for essential services such as water treatment facilities and cell phone tower power. We believe the proposed Reach Codes should ensure that residents across the state have the same assurance of clean, reliable power.

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 in this area and hope the Commission and staff take a 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", written in a cursive style.

Ben Granholm
Regulatory Affairs Specialist

cc: Danuta Drozdowicz