

**DOCKETED**

<b>Docket Number:</b>	19-BSTD-03
<b>Project Title:</b>	2022 Energy Code Pre-Rulemaking
<b>TN #:</b>	235282
<b>Document Title:</b>	Delta Liquid Energy Comments - Please Preserve Propane as a Clean Energy Option
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Delta Liquid Energy
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	10/16/2020 11:30:00 AM
<b>Docketed Date:</b>	10/16/2020

*Comment Received From: Delta Liquid Energy  
Submitted On: 10/16/2020  
Docket Number: 19-BSTD-03*

## **Please Preserve Propane as a Clean Energy Option**

Good Afternoon,

I am submitting my comments regarding the California Energy Commission's proposed 2022 Energy Codes on behalf of Delta Liquid Energy. We are a fourth-generation family owned and operated propane marketer servicing many rural parts of the state. Our business has supplied a reliable energy source to many homes and businesses for nearly 90 years. Propane is resilient, affordable, sustainable, and is a clean energy solution that is readily available now.

We've seen throughout recent fire seasons that public safety power shut offs are a necessary safety precaution. In some areas we service, these shut offs lasted days. Customers in those areas were so grateful to have propane as a power source during these shut offs. Without propane, they would not be able to continue to cook, heat their homes, and power necessary medical and life saving equipment. Additionally, when propane is combined with solar, the pair can create a carbon neutral home.

Propane also provides back up power for critical infrastructure needs during emergencies. We have customers who use propane to power basecamps for firefighters while they are in the midst of protecting our state. Hospitals, nursing homes, and water treatment facilities are also essential businesses that use propane to power their operations in emergencies.

Per the CEC, propane accounts for just 0.055% of our state's overall greenhouse gas emissions. Propane is non-toxic, non-carcinogenic, and is a non-methane gas. Our industry is investing heavily in renewable propane and, in California, we've committed to becoming fully renewable by 2030. The California Air Resources Board released data last year that showed renewable propane has a carbon footprint on par with and sometimes lower than electricity. Renewable propane is completely fungible, meaning it seamlessly works with conventional propane and thus does not require any system or equipment upgrades for our customers. This makes it a cost-effective participant in our solution to climate change.

Electric heat pumps cost hundreds of dollars more annually than their propane powered counterparts. Setting a baseline that is only achievable with electric appliances will continue to drive up housing prices in California. Additionally, electricity prices are on the rise and this trend will continue over the next few years. As we continue to strain the electrical grid, maintenance costs will also be factored into pricing, increasing rates even higher. Propane provides clean energy at a rate often lower than electricity.

We thank you for your efforts in creating cleaner regulations for building in our state and urge you to consider the positive benefits of propane. A single energy solution to climate change is not the answer. There are ways that all clean energy available now can work in tandem to reach our state-wide climate goals.

Respectfully,

Allison Platz-Velazquez

Marketing Manager, Delta Liquid Energy