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Comments of the American Gas Association

AGA comments on the Commissioner Webinar Workshop on the 2022 Energy Code Pre-Rulemaking, "Advances in Scientific Understanding of the Impacts of Indoor Cooking and Associated Ventilation on Indoor Air Quality," September 30, 2020, Docket Log (19-BTSD-03) are attached electronically.

Additional submitted attachment is included below.



October 16, 2020

Electronically Submitted to:
Docket Log (19-BTSD-03),
California Energy Commission
1516 9th Street
Sacramento, CA 95814

Subject: Comments on the Commissioner Webinar Workshop on the 2022 Energy Code Pre-Rulemaking, “Advances in Scientific Understanding of the Impacts of Indoor Cooking and Associated Ventilation on Indoor Air Quality,” September 30, 2020, Docket Log (19-BTSD-03)

Dear Sir/Madam:

The American Gas Association (AGA), founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 71 million residential, commercial and industrial natural gas customers in the U.S., of which 92 percent — more than 65 million customers — receive their gas from AGA members. Today, natural gas meets almost one-fourth of the United States' energy needs.

AGA thanks the Commission for the opportunity to participate in the subject event and provide comments during the event and through this comment submission process. As Senior Director of Codes and Standards at AGA, I have been working on indoor air quality (IAQ) issues and natural gas-fired appliances for over 30 years, including work on the following technical areas:

- Unvented gas-fired heaters and carbon monoxide (CO) and nitrogen dioxide (NO₂) emissions in conjunction with efforts of the U. S. Consumer Product Safety Commission (CPSC) and for revision of the American National Standards Institute (ANSI)-recognized national consensus standard, Z21.11.2, “Gas-fired Room Heaters, Volume II, Unvented Room Heaters”
- Natural gas fired residential gas cooktop and oven appliance testing in conjunction with parallel CPSC-performed testing and evaluation of Standard Z21.1, “Household Cooking Gas Appliances“ for relevance of air-free emission rate requirements for CO in that standard and for consideration of revisions to the standard’s requirements

- AGA-sponsored laboratory testing of natural gas residential ranges for air-free NO₂ and CO emission rates by a nationally recognized testing laboratory (NRTL) for developing public data on air-free emission rates.
- Technical evaluation of venting performance for vented residential appliances, building depressurization, and potential household concentrations of combustion emission products
- Membership on the ASHRAE Standing Standard Project Committee (SSPC) for Standard 62.2, “Ventilation and Acceptable Indoor Air Quality in Low-Rise Residential Buildings” and technical working groups on related coverage of IAQ issues in standards developed by the Air Conditioning Contractors of America (ACCA) and Building Performance Institute (BPI).

As a participant in the Commissioner Webinar Workshop, I offer the following comments, which represent my views and not necessarily those of AGA or its member companies:

- The Webinar Workshop was prompted by IAQ and advocacy interest groups interested in eliminating natural gas as an option and as such did not represent alternative technical interpretations of scientific information or consensus on critical technical aspects addressed by the event. I requested the opportunity to participate on the agenda as a stakeholder, but I was denied that opportunity, leaving only the Webinar question and answer (Q&A) period as my opportunity to contribute. This approach, if applied more generally to stakeholders interested in participating, is likely to have shut out important contributions that would have provided a more balanced discussion of technical issues. As it played out, the selection of participants for presentation of materials at the event led to a biased agenda in terms of technical content and did not satisfy the objective of communicating “advances in scientific understanding” in terms of combustion emissions, IAQ exposures, and health effects.
- Many of the advocates’ positions against gas-fired residential cooking hinge upon air pollutant emission rates developed by Lawrence Berkeley National Laboratory (LBNL), which were not discussed in sufficient detail to justify their use in advocacy about public health, especially in context of health-based U. S. air quality standards. Over-representation and use of the LBNL emission data have prompted the natural gas and cooking appliance industries to go forward with development of more robust and transparent emission rate data development and potential exposure estimates. To that end, AGA is co-sponsoring with the Association of Home Appliance Manufacturers (AHAM) and the Propane Education and Research Fund (PERF) testing of gas-fired residential ranges emission

testing covering five major categories of combustion pollutants and operating on both natural gas and propane. However, Webinar participants were not afforded the opportunity to hear about issues of the LBNL data or these industry efforts to develop emission rate data.

- The Webinar did not address public comments for either advocates or other interests submitted to the document. This shortcoming raises the question of how docket submissions are treated in the rulemaking process and their relevance. While the agenda for the Webinar did not reflect a balance of interests, the docket represents a better approximation of interests. For example, included in the docket are comments covering economic costs versus benefits of “going all electric” but the Webinar did not address these tradeoffs.
- Notably, national expertise in health and safety issues associated with IAQ were not represented among the panelists for the Webinar and apparently were not invited to participate. As a result, the presentations on health and policy issues were isolated to a small and somewhat insular group of experts. The Commission would have been better served to enlist participants for the national groups representing responsibilities for human health and IAQ exposures. Specifically, the Commission should have enlisted the participation of members or the leadership of the Federal Interagency Committee on Indoor Air Quality (CIAQ), which represents over 20 federal government agencies with responsibilities for acceptable IAQ. Members of CIAQ sponsor regular webinars and conference presentations available to interests tracking CIAQ work and covering the relationship of asthma and indoor air and other IAQ topics that are germane to the concerns of the Commission in this rulemaking.
- Given these issues, the Commission should schedule a second webinar to hear alternative viewpoints covering review of cited health studies, relationships to actual exposures of emissions from gas-fired residential cooking appliances, inclusion of cooking process emissions (i.e., other than fuel combustion emissions), occupant exposures relating to different classes of consumers, and potential health effects. AGA’s role in such an event would be focused on the co-sponsored cooking appliance testing program, leaving discussion of most of the other topics to other participants with specific expertise in the relevant technical areas.

This concludes my comment on the Commissioner Webinar Workshop. AGA would look forward to participating in future events related to this rulemaking since while the topic is one before the State of California, national efforts in which AGA is active or at least working with could well serve the decision-making process in California.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ted A. Williams". The signature is written in black ink on a light-colored background.

Ted A. Williams
Senior Director, AGA Codes and
Standards