

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	237035
Document Title:	Rob Koslowsky Comments - Targeting A City is Objectionable; So Is Targeting Homeowners
Description:	N/A
Filer:	System
Organization:	Rob Koslowsky
Submitter Role:	Public
Submission Date:	3/8/2021 2:11:02 PM
Docketed Date:	3/8/2021

*Comment Received From: Rob Koslowsky
Submitted On: 3/8/2021
Docket Number: 19-BSTD-03*

Targeting A City is Objectionable; So Is Targeting Homeowners

Please repeal the 2019 Building Code making rooftop solar a mandate. Choice for homeowners to use solar, or not, must be restored. Resiliency is best served by allowing residents to enjoy the services of both gas and electric.

Below is an example where choice was allowed, which includes an undersized rooftop solar system (pre-mandate) AND natural gas services. These homes are much more resilient than those forced to become all-electric.

Thank you for your consideration,
â€¦Rob

Additional submitted attachment is included below.

Targeting A City is Objectionable; So Is Targeting Homeowners . . .

ROB KOSLOWSKY <rob.koslowsky@sbcglobal.net>

Mon 3/8/2021 6:30 AM

To: Energy - Public Advisor's Office <publicadvisor@energy.ca.gov>

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern:

For Docket #: 19-BSTD-03 Project Title: 2022 Energy Code Pre-Rulemaking

Please repeal the 2019 Building Code making rooftop solar a mandate. Choice for homeowners to use solar, or not, must be restored. Resiliency is best served by allowing residents to enjoy the services of both gas and electric.

Below is an example where choice was allowed, which includes an undersized rooftop solar system (pre-mandate) AND natural gas services. These homes are much more resilient than those forced to become all-electric.

Thank you for your consideration,

....Rob

=====

Targeting A City is Objectionable; So Is Targeting Homeowners . . .

“Renewable electricity is how the most affluent people in the world justify, to themselves, their lavish overconsumption of energy, its environmental impact, and its financial impact on the less fortunate among us. Seems rather greedy, doesn't it?”

– Bob Meinetz, industry observer, January 16, 2021

Targeting a city is objectionable, argued Rohnert Park Councilwoman Susan Hollingsworth-Adams, yet targeting homeowners is not.

On the issue of increased targeting for more affordable housing units assigned to Healdsburg and Windsor, Hollingsworth-Adams complains [1]: “This is an overreach by the state of California. We’re going to lose the flavor of our communities if we’re all just assigned numbers by the state, and this is how many houses you have to build next year.”

Welcome to the club of state overreach, where homeowners are forced to buy all-electric new homes without natural gas. This is not only state, but also city overreach at the most objectionable, an overreach that makes housing even more costly for low-income and middle class homebuyers. So it’s ironic that Councilwoman Hollingsworth-Adams is complaining about overreach.

If it’s *not* okay to target cities, why isn’t *not* okay to target homeowners? I’d like to see our municipal leaders be consistent in what they object to and what they do not object to. Application of reach codes and natural gas bans is objectionable too. Just ask many Democratic state leaders who are furious over such targeting [2].

Sam Salmon, a Windsor town council member, was, at least, respectful of the information I sent him on objections to all-electric reach codes and natural gas bans, both which should be stricken from the books by all municipalities.

He wrote, "You provide arguments that bear listening to but our 'all electric code' was one fairly small effort to do everything we can to change our reliance on fossil fuels."

I asked the councilman, to please consider directing some of his time toward *carbon reduction pursuits* such as carbon capture and storage technology, as presented by Lawrence Livermore National Laboratories last year and reinforced by the just-released 2021 study by the National Academy of Sciences [3]. This direction would provide a much bigger impact on greenhouse gas reduction than assailing the local housing market with optional, state-sponsored building code changes. It appeared to me that his "cause," embodied in his town's retracted natural gas ban ordinance, may be blinding him and his colleagues in supporting local homeowners and taxpayers.

More Housing is Needed

I reiterated that my feedback had nothing to do with lawsuits. Rather, as an advocate for homeowners, it's clear that targeting them does little to solve greenhouse gas emissions. In fact, California CO₂ emissions are down and U.S. emissions have also fallen over the last two years. This singling-out of families drives up the cost of housing in Windsor and Sonoma County as well as the costs of rentals. Excessive regulations such as resilient-breaking natural gas bans, forced rooftop solar as a textbook example of bad public policy, and expensive all-electric mandates are driving, in part, housing developments away.

As *The Press Democrat* reported on January 4, 2021, "A pair of long-planned housing projects in downtown Windsor have ground to a halt after the developer of the two large multifamily complexes failed to secure financing and defaulted on one of the sites, leaving the second development in limbo as well."

How many new single-family homes has the Town of Windsor built in the last three years, either as in-fill or by establishing new subdivisions (besides the JKB Living project along Hembree)?

Even this new subdivision features natural gas and the more cost-effective tankless water heater to help keep utility costs down. The builder of Portello recognizes the Town of Windsor's obsession for all-electric, and has relented somewhat by offering the State's prescribed, under-sized solar system. However, for a few extra dollars, the builder offers an upgrade, marketed as super-efficient, solar-powered: "While solar energy may not offset all homeowners' personal usage, buyers will have the option to upgrade and optimize their solar system [4]." Ka-ching, ka-ching, as the tally for housing rises, and places to live become less affordable in Sonoma County.



Typical home in Portello subdivision, Windsor, Sonoma County. It features both electric and natural gas services. Photo courtesy R.K. Koslowsky, January 25, 2021

Managed residential development plus helping families to stay and live and work in their chosen community is what makes them vibrant places. Affordability makes this happen.

I'd argue that politicians, like Sam, don't have the moral imperative to preach: "This Country and others need to adapt and make changes in lifestyles . . ." Instead, please focus on Windsor and Sonoma County and help to make housing more affordable, help to make homes and apartments more resilient (supporting both electric and natural gas capability), and support energy diversity to continue to improve residents' quality of life.

It's a simple message. It's a fair request.

If wind and solar are bad for the electric grid, then rooftop solar is even worse. As Gretchen Bakke writes, "If variable generation is bad for the grid, then distributed, renewable generation is worse."

Source: *The Grid* (2016), p.234.

[1] *The Press Democrat*, February 10, 2021, pp. A3–A4.

[2] Both Assemblyman Jim Cooper, a Democrat from Elk Grove, and Assemblywoman Blanca Rubio, a Democrat from the Los Angeles area, are strongly against "the growing 'ban natural gas' chorus from organizations such as the Sierra Club, the Environmental Defense Fund (EDF) and Union of Concerned Scientists to name a few." Their tactics have "become more aggressive, and there has never been a mention by them about what the cost impacts would be on customers who are struggling with utility costs, and household expenses."

Source: [California's Natural Gas Bans Are Drawing Fire From Black And Latino Leaders](#), *Forbes*, December 15, 2020.

[3] "The transition [to net zero] might exacerbate inequity, concentrate opportunity in the hands of a few, accelerate the offshoring of manufacturing, and fail to mitigate job losses in industries and regions that are left behind."

Source: [Accelerating Decarbonization of the U.S. Energy System](#), *National Academy of Sciences*, 2021, p.8

[4] Pulled from JKB homes Portello subdivision, February 13, 2021:

<https://www.jkbliving.com/communities/windsor>

Rob Koslowsky

Author of **The Tubbs Fire.**

Also author of ***The Upstart Startup*** & **Breach of Trust.**

[Author's page](#)