

*Comment Received From: Western Propane Gas Association
Submitted On: 3/19/2021
Docket Number: 19-ERDD-01*

WPGA Letter RE Docket No 19-ERDD-01 - Impact of Gas Stove Interventions on Children with Asthma Workshop

Additional submitted attachment is included below.



March 19, 2021

Maninder Thind, Air Resources Engineer
California Energy Commission
Docket Unit, MS-4
Docket No. 19-ERDD-01
1516 Ninth Street
Sacramento, CA. 95814
docket@energy.ca.gov

SUBMITTED VIA EMAIL

Re: Docket Number 19-ERDD-01: Randomized Trial Study to Determine the Impact of Gas Stove Interventions on Children with Asthma Workshop

Dear Mr. Thind and staff:

The Western Propane Gas Association (WPGA) appreciates the opportunity to provide these comments, and the need to mitigate all forms of indoor pollutants that diminish indoor air quality (IAQ). This need of course no greater than it is in low-income and minority communities.

WPGA encourages the CEC to adopt a fuel-neutral perspective as it develops its research program. Great emphasis has been made as of late on the ability of electric stoves to improve IAQ. However, little attention is being given to measures that can improve the efficiency of combustion-based cooking, or the ability to deploy more advanced controls for rangehoods that can better ensure proper operation.

WPGA encourages the CEC to include the following considerations as this program is developed:

- Properly distinguish and measure indoor pollutants from cooking, combustion, and other pollutants present in the home.
- Research the effectiveness of rangehoods with automatic controls at reducing indoor pollutants.
- Review and assess the viability of alternate combustion technologies, such as Ring-Stabilizer Burner combustion technology¹.

WPGA remains committed to innovations that will reduce greenhouse gas emissions and provide cleaner air for all communities. Our organization has issued our sustainability statement with the goal of having 100% renewable propane for Californians by 2030. Renewable propane is derived entirely from sustainable sources. We look forward to working alongside with the CEC on this specific study.

Sincerely,

Ben Granholm
Regulatory Affairs Specialist

¹ Peter Therkelsen, Robert Cheng, and Darren Sholes of Lawrence Berkeley National Laboratory. *Research and Development of Natural Draft Ultra-Low Emissions Burners for Gas Appliances*. For: California Energy Commission. (July 2016). At: <https://ww2.energy.ca.gov/2016publications/CEC-500-2016-054/CEC-500-2016-054.pdf>