

DOCKETED

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Shifting to a Nighttime Load Using Electric Vehicle Mandates

To Whom It May Concern:

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

Please repeal the 2019 Building Code making all-electric residential construction a mandate. All-electric mandates should not be made jointly with all-electric automobile (EV) mandates in order to force nighttime charging just to maintain the state's electric grid.

Resiliency, choice, flexibility, and safety are best served by allowing residents to enjoy the services of natural gas, gasoline, and electric. The attached April 19, 2021 submission reflects some of the reasons to repeal the EV mandate, forestall any natural gas bans, and exclude mandates for both all-electric construction and proposed residential battery systems " Shifting to a Nighttime Load Using Electric Vehicle Mandates_RKK_April 2021.

Thank you for your consideration,
Rob

Additional submitted attachment is included below.

Shifting to a Nighttime Load Using Electric Vehicle Mandates

“One of the reasons that electric cars have received such public praise is that they can be programmed to charge almost exclusively at night and thus provide the rarest of beasts – substantial midnight load.”

– Gretchen Bakke, *The Grid*, 2016, p.66

“More money will be spent on Electric Vehicle programs in the proposed \$2.2T stimulus bill than is to be spent on roads and bridges.”

– Various news reports, April 2021

Nighttime use of electricity remains a problem for our utilities in 2021. There is not enough consumption to keep operation of the electric grid balanced. Gretchen Bakke writes, “Even taking into account public street lighting, electricity use drops off precipitously as people start to go to bed and only starts to creep upward again around six A.M.”

Governor Newsom eschewed the free market and instead mandated another, of what he believes is an, environmentally-friendly solution, albeit primarily political in nature. After finally being convinced by his political donors and green activists to ban gasoline-powered automobiles and trucks, he subsequently aligned himself with both the *state’s utility operators* and *car manufacturers* to propose a solution for all of these competing interests – everyone in California must drive an Electric Vehicle (EV) and charge them at night to reduce daytime power outages.

And utility operators must force time-of-use electric rates on customers [1]. This process is already underway.

And car manufacturers must shift production from gas to electric. And this transition is planned to occur in the near future [2]. Plus, California residents will have to charge their power-hungry, state-mandated EVs during the nighttime hours. The idea, disguised as a solution, is to force compliance and behavioral conformity to reduce daytime peak electrical loads brought on by all-electric mandates. The first decree released was that new building construction must be all-electric, followed by this electric vehicle mandate, and, the soon to be enforced, convert every home and building to all-electric operation [3].

The winners?

Utility operators who love keeping their power plants running at night to drive up profits; *Automobile manufacturers* who can increase profits by selling more expensive EVs; and, the *environmental elites* who can pat themselves on the backs for making the poor and middle class kowtow to their will and religious zeal.

The losers?

California residents subjected to higher energy costs, higher transportation costs, higher utility rates, increasing fees and taxes, and a loss of resiliency, choice, and safety.

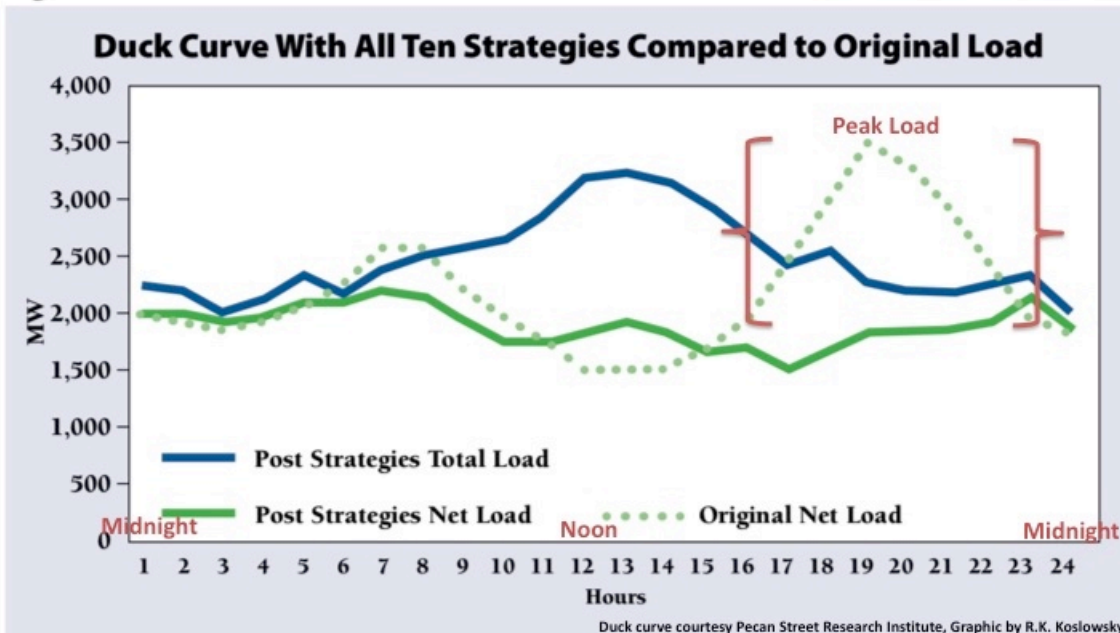
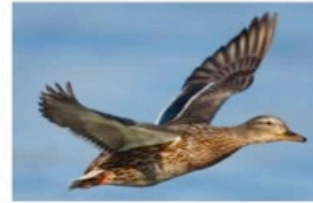
Instead, Californians Are Told to Worship the Duck

The Solar Duck Curve (dotted line)

Change the Peak Load – re-orient solar panels to face west

Also recommended for all-electric buildings, to prevent blackouts:

- Charge EVs at night
- Shower after midnight using new heat pump
- Replace AC with attic-based ice cooling system



Compelling the purchase of Electric Vehicles and mandating that they be re-charged at night is the government’s solution to reducing the number of rotating blackouts due its forced increase of all-electric home construction

At least we’ve learned what it means to live in the Golden State in the 2020s. It means to “Keep it Golden[®],” according to Energy Upgrade California, and be sure to “Power Down from 4 to 9PM.” Residents must obey, kneel down, swear an oath of fealty to the state, and show supplication whenever a Californian must use electricity during this 4 to 9 p.m. timeframe.

One commandment: Thou shalt have no other gods before the State of California.

Another commandment: “From 4 to 9PM, energy demand is high, and less wind and solar power is available.” What does this mean? “By using less electricity during these hours, residents will ensure that their energy is coming from cleaner sources.”

Keep it Golden[®] believers beware: The State does not guarantee air conditioning will operate during the summer, nor does it ensure rotating blackouts will be avoided.

Don’t you just hate being a loser?

“The gasoline powered car costs about \$25,000 while the Volt costs \$46,000-plus. So the [government says don’t] do the math, but simply pay twice as much for an electric car, that costs more than seven times as much to run, and takes three times longer to drive across the country.”

– Rich Adams, CSRA, December 2020

“Rather than go through all of these machinations and forcing unneeded regulations in the name of climate change, why not simply use technology in the form of direct air capture to remove carbon dioxide from the atmosphere and produce fuel for those automobiles currently being driven around the world.”

– R.K. Koslowsky, April 2021

[1] During January 2021, PG&E mailed a letter telling customers that its three-tiered E1 rate system would be replaced by a time-of-use rate plan, unless the customer chose to opt out. Every electric customer had to be opted in, unless the effort was made by the customer to call PG&E and opt out of this Newsom-inspired regulatory shift, a change in rate plan forced onto utility operators by politicians and unelected, activist commissioners.

[2] It was easy for automobile manufactures to sign onto Biden’s climate change agenda, since both Europe and China have become these companies’ largest automobile markets:

General Motors: GM plans to exclusively offer electric vehicles by 2035, ending production of its cars, trucks and SUVs with diesel- and gasoline-powered engines. GM had coordinated with the Biden transition team as its announcement came one day after Biden signed a series of executive orders that prioritize climate change over everything else.

Ford: Ford says by mid-2026, all of its passenger vehicles in Europe will be zero-emissions capable, all-electric or plug-in hybrid; moving to all-electric by 2030. For the U.S. market, Ford announced a \$29 billion investment in EVs and autonomous vehicles through 2025. Beyond that, the majority of the company’s vehicles will be electric, while traditional gasoline powertrains will be augmented with hybrid and plug-in hybrid powertrains.

Volvo: Volvo is only going to sell electric vehicles by 2030, the Swedish firm said in March 2021. The company will phase out all car models with internal combustion engines by then, including hybrids. Volvo is “trying to capitalise on growing demand for electric cars, including in China, which is already one of its biggest markets,” according to BBC News on March 2.

[3] *California Homeowners Will be Faced with a \$100,000 Upgrade*, submitted by R.K. Koslowsky, November 2020: “If a natural gas ban is invoked, Replace-on-Burnout is not a viable option for homeowners. No flowing gas means in situ units will not function and retain no resale value. While replacing a gas dryer may not represent a huge financial hardship, replacing an on- demand (gas) water heater would, especially since they’ve been designed to last in excess of 17 years and already provide at least a 98% energy efficiency. A return to an electric-based system featuring a large water tank is a big step backward . . . With respect to direct replacement using heat pump technology, this is not practical. Furnaces and water heaters are often located in attics and small closets, respectively, environments not suitable for the space required for proper heat-pump operation. Furthermore, for an electric heat-pump (e.g. ASHP) to be effective its supposedly improved performance and cost effectiveness requires “tighter homes,” according to a 2018 study by NEEP, The Smart Energy Home. That means a California home built prior to 2016 will require

further insulation upgrades (to name one efficiency improvement) or else an over-sized and more costly heat-pump may be required. Such practical replacement scenarios undermine most study results. This incremental installation cost, among others to produce a “tighter home,” is not included in most studies’ upgrade cost. The NEEP authors conclude that all-electric heat pumps are “not cost competitive with natural gas for space and water heating.” And they may not be for another 10 to 20 years. A similar finding was described in TRC’s oft-quoted Palo Alto study of 2016.”

[4] Rather than go through all of these machinations and forcing unneeded regulations in the name of climate change, why not simply use technology in the form of direct air capture to remove carbon dioxide from the atmosphere and produce fuel for those automobiles currently being driven around the world (a liquid fuel not for Electric Vehicle use)? Please view the **attached** MPEG-4 video produced for HBO: “Use Captured CO2 as Fuel for existing automobiles_no EVs needed and Save 50T dollars_HBO.”