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Rob Koslowsky Comment re 2022 Energy Code Rulemaking

To Whom It May Concern:

For Docket #: 21-BSTD-01 Project Title: 2022 Energy Code Rulemaking

The power grid is becoming less reliable due to America's growing dependence on wind and solar, which, on their own, can't provide power 24 hours a day, seven days a week, or even when outdoor temperatures change. Most Californians have come to realize that the loss of electric power during hot summer days or red flag warning days isn't due to poor planning, but is a result of this reliance on solar and wind energy, which disappears as the sun sets or the winds calm. This has led to electric grid instability.

Please repeal the 2019 Building Code making all-electric residential construction a mandate. Furthermore, 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. Therefore, mandatory battery backup systems should not be included in the proposed 2022 Building Code.

Resiliency, choice, flexibility, and safety are best served by allowing residents to enjoy the services of natural gas, gasoline, and electric. The attached May 17, 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 "Don't Forget About the Electric Grid This Summer_RKK_May 2021.

Thank you for your consideration,

Rob

Rob Koslowsky, Cloverdale, California
Author of The Tubbs Fire.
Also author of The Upstart Startup & Breach of Trust.

Additional submitted attachment is included below.

Don't Forget About the Electric Grid This Summer

“The United States experiences more power outages than any other developed nation, with statistics showing the number of power outages rising annually.”

– U.S. Power Grid report, December 2020

“The managers of California’s electricity system can’t promise they’ll be able to keep the lights on this summer.”

– Dale Kasler, *Sacramento Bee*, May 5, 2021

It has become clear during the last few years that the increased penetration of solar and wind energy – called distributed energy resources or DERs – has destabilized the electric grid, even as reliable and centralized nuclear and natural gas electric production has been shuttered.

To offset this loss of continuous energy production capabilities, both utility-scale storage and soon-to-be-mandated building battery backup systems [1] have to fill the breach. Impractical, high-capacity battery storage has become a requirement just to replace the buffer capacity provided by natural gas generators. Ironically, while *buffers* for running our electric grid are frowned upon, they’re a basic requirement for using our video streaming service(s) over the Internet.

California’s Misguided Mandates

Nuclear power plants have been shuttered or are being shuttered so forced rooftop solar has been mandated to make up the shortfall. All new construction must include an *undersized rooftop* solar system [2] and, in the near future, all existing structures will be required to undergo costly six-figure upgrades to comply with the associated all-electric mandates [3].

Soon, more garage space will be sacrificed under state mandates [4] to include both an Electric Vehicle (EV) charger and a wall-mounted battery backup system, connected to the rooftop solar system with a custom-fit, elaborate energy management system. This added complexity gives the state/utility provider the ability to remotely connect your mandated EV to the electric grid. All of a sudden your new EV, with its rechargeable battery, becomes a required element in the state’s vehicle-to-grid (V2G) network. Your investment is no longer yours, since the degradation of the battery, as it goes through numerous discharges and recharges on a daily basis, is just part of keeping the electric grid stable to avoid brownouts and rotating blackouts.

Even so, there has been very little progress on upgrading the electrical distribution plant, even though Governor Schwarzenegger challenged Californians to deploy more rooftop solar over a decade ago. The added strain on an aging electric grid is exacerbated by the move to all-electric construction, the requirement for all-electric home appliances, the legalization of power-hungry (and water hungry) cannabis grows, and the two-direction requirement of sending power back and forth between all connected structures across smaller and smaller distributed networks. Efficiency gains are lost by shuttling power back

and forth (wheeling) among distribution networks and long-distance electric networks. The grid is already beginning to creak as evidenced by outages both big and small (ones usually not even noticed by users, but detected by their electric appliances).

Unanswered Questions

What happens with California's misguided electrical strategy when it inevitably leads to a greater frequency of blackouts and brownouts, and further electric grid instability? What will happen to the distribution grid when all 12 million homes in California and its 20+ million cars become all-electric?

These are just some of the questions *not* being answered.

I hope they're not answered, however, with more frequent and longer duration power outages.

Raising Your Own Chickens and Producing Your Own Power

While homeowners are being forced to become mini-utility operators, they have not yet been forced to own their own chickens.

I prefer to pay for my electric and gas service and not have to produce my own electricity by managing an intricate system of solar panels, battery backup, a connected EV and charger, all connected by a complex management system.



It's also why I prefer to buy my eggs, chicken breasts, chicken wings, and more at the grocery store and not have to raise chickens to collect eggs or kill them, eviscerate them, and butcher them to enjoy chicken meat.



I'd prefer not to clean my solar panels, maintain the solar battery and EV systems, or ever repair and replace them, just as I'd prefer not to feed my chickens, raise their chicks, and clean up after them.

I'd prefer not to sacrifice my rooftop or garage space to keep a complex energy-producing system on my property, just like I'd prefer not to sacrifice yard space for chicken coops and space for the chickens to exercise.



If local ordinances are against raising your own chickens, why are they in favor of producing your own power?

Images courtesy Shutterstock and Krisdog, Graphic courtesy R.K. Koslowsky

It's about time the state rescinds its rooftop solar mandate, it's all-electric mandate, it's support for natural gas bans, and allows Californians to enjoy choice, resiliency, and a diverse energy supply.

“If it’s another ‘West-wide heat event’ that smothers multiple states, as was the case last August, then California might not be able to import enough power to get through the crunch.”

- Elliot Mainzer, president of CalISO, which runs the electric grid, May 5, 2021

“For the first time in more than a century, California recorded a net loss in population . . . a decline in 2020 of 182,083 Californians, or the equivalent of about two Santa Barbaras.”

- Startling loss of residents for state, *NY Times*, May 8, 2021

{RKK: The high cost of housing and living is cited as a major contributor.}

[1] *“Solar” Batteries Mandated for Homeowners’ Garages is Bad Public Policy*, R.K. Koslowsky, submitted, December 21, 2020.

[2] *Mandating Rooftop Solar is a Bust*, R.K. Koslowsky, submitted October 12, 2020 AND *Getting Solar Right or Do They Mean Wrong?* R.K. Koslowsky, submitted September 14, 2020.

[3] *Homeowners Will be Faced with a \$100,000 Upgrade Fee*, R.K. Koslowsky, submitted September 28, 2020.

[4] Heat pumps take up an additional 100 square feet of garage space and as homes shrink with “zero” yard space and little street parking, the AC condenser will have to fight for space on the roof with mandated, undersized rooftop solar installations. For more, please also see: *Shifting to a Nighttime Load Using Electric Vehicle Mandates*, R.K. Koslowsky, submitted April 19, 2021.