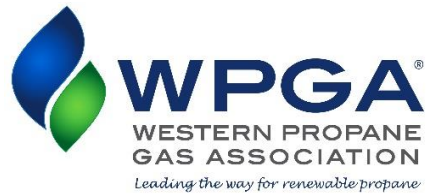


*Comment Received From: Western Propane Gas Association
Submitted On: 9/8/2021
Docket Number: 21-IEPR-05*

WPGA Comments RE IEPR RNG Workshop

Additional submitted attachment is included below.



September 8, 2021

California Energy Commission
Raquel Kravitz, IEPR Project Manager
Docket Unit, MS-4
Docket No. 21-IEPR-05
715 P Street
Sacramento, California, 95814-5512

SUBMITTED VIA EMAIL

RE: IEPR Commissioner Workshop on Renewable Natural Gas – Docket No. 21-IEPR-05

Dear Ms. Kravitz and IEPR staff:

Thank you for the opportunity to comment on the August 31st IEPR Commissioner Workshop on Renewable Natural Gas. The Western Propane Gas Association (WPGA) seeks to be a valuable contributor during these workshops and the policies and procedures that may emerge as a result of these discussions.

During both sections of the workshops, there was quite a bit of discussion related to areas that are labeled as “hard to electrify.” While the state may not yet have an adequate definition, propane customers by default are hard to electrify. Propane customers are generally in rural, older homes, colder climates, where combustion appliances will continue to be the most cost-effective way to deliver space and water heating. Additionally, because propane customers tend to be more rural, they also tend to be more vulnerable from a resiliency perspective. Further from infrastructure, more exposed to wildfires and the risk of public safety power shutoff events, propane customers have the most critical need for secondary heating throughout the state. For cooking, for heat, access to propane can be crucial to basic survival.

As the state discusses and plans for a decarbonized economy it is critical as a matter of equity and practicality that propane customers be given due consideration. The CEC’s workshop on August 31 indicates this to not be the case. Propane serves nearly all of the same end uses as natural gas, but does so in a manner more amenable to the state’s climate goals. First, WPGA already has an existing commitment to developing 100% renewable propane by 2030. Second, propane is a modular fuel source that can be added to a home or community without the expansion of expensive and vulnerable infrastructure, a fundamental benefit in rural communities.

WPGA looks forward to continuing its long-standing efforts to deliver clean and affordable fuel across California. With an existing commitment to deliver renewable propane by 2030, WPGA is excited to be an active partner in reaching the state’s climate change and sustainability goals. While natural gas serves more homes in California than propane, WPGA urges the CEC to better include propane as a viable renewable fuel stock, and **properly consider propane customers as vulnerable and hard to electrify.** With this in mind, WPGA seeks for the CEC to include renewable propane and propane customers in its renewable gas forecasting, and long-term policy planning activities.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Granholm", is written over a white background.

Ben Granholm
Regulatory Affairs Specialist