



City Clerk Council and Public Services <clerk.cps@lacity.org>

Fwd: WPGA Letter RE City of Los Angeles Development of Reach Codes

1 message

Anna Martinez <anna.martinez@lacity.org>
To: Clerk Council and Public Services <Clerk.CPS@lacity.org>

Tue, Jan 21, 2020 at 8:23 AM

----- Forwarded message -----

From: **Ben Granholm** <ben@westernpga.org>

Date: Mon, Jan 20, 2020 at 11:24 AM

Subject: WPGA Letter RE City of Los Angeles Development of Reach Codes

To: mayor.helpdesk@lacity.org <mayor.helpdesk@lacity.org>Cc: councilmember.cedillo@lacity.org <councilmember.cedillo@lacity.org>, councilmember.Krekorian@lacity.org <councilmember.Krekorian@lacity.org>, councilmember.blumenfield@lacity.org <councilmember.blumenfield@lacity.org>, david.ryu@lacity.org <david.ryu@lacity.org>, paul.koretz@lacity.org <paul.koretz@lacity.org>, councilmember.martinez@lacity.org <councilmember.martinez@lacity.org>, councilmember.rodriguez@lacity.org <councilmember.rodriguez@lacity.org>, councilmember.harris-dawson@lacity.org <councilmember.harris-dawson@lacity.org>, councilmember.price@lacity.org <councilmember.price@lacity.org>, councilmember.wesson@lacity.org <councilmember.wesson@lacity.org>, councilmember.bonin@lacity.org <councilmember.bonin@lacity.org>, councilmember.Lee@lacity.org <councilmember.Lee@lacity.org>, planning@lacity.org <planning@lacity.org>, councilmember.buscaino@lacity.org <councilmember.buscaino@lacity.org>, councilmember.ofarrell@lacity.org <councilmember.ofarrell@lacity.org>, councilmember.huizar@lacity.org <councilmember.huizar@lacity.org>, CityClerk@lacity.org <CityClerk@lacity.org>

Good morning Mayor Garcetti and Councilmembers,

The Western Propane Gas Association (WPGA) would like to thank you for the opportunity to comment on the City of Los Angeles's development of proposed Reach Codes aimed at reducing greenhouse gas emissions in the building sector. While we applaud efforts for building decarbonization, WPGA believes that Reach Codes disincentivizing propane as a complementary fuel source to electric are fundamentally misguided.

We hope the attached letter will prove helpful throughout this process and look forward to working with you as Los Angeles and the State strive to reduce greenhouse gas emissions through comprehensive clean energy solutions.

Please do not hesitate to contact me with any questions you may have.

Thank you,

Ben Granholm

Regulatory Affairs Specialist

Western Propane Gas Association

2012 H Street, Suite 203

Sacramento, CA 95811

1/21/2020

City of Los Angeles Mail - Fwd: WPGA Letter RE City of Los Angeles Development of Reach Codes

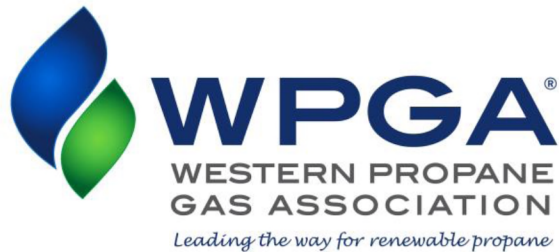
Cell: (530) 205-5641

www.westernpga.org



WPGA Letter RE City of Los Angeles Development of Reach Codes - 1.20.20.pdf

585K



January 20, 2020

Eric Garcetti, Mayor
City of Los Angeles
Los Angeles City Hall
200 N. Spring Street
Los Angeles, California, 90012

SUBMITTED VIA EMAIL

RE: City of Los Angeles Development of Reach Code

Dear Mayor Garcetti and Councilmembers:

Thank you for the opportunity to provide input on the City of Los Angeles considering the development of Reach Code amendments to the Los Angeles Energy Efficiency Code. The Western Propane Gas Association (WPGA) seeks to be a valuable contributor in both the development of the Reach Code and the policies and procedures that may emerge as a result of these discussions.

WPGA would like to emphasize that while we applaud decarbonization efforts, we believe that the Council should take a comprehensive approach toward providing consumers with clean energy solutions and low-carbon fuel options.

The propane industry is proud of the role we play in providing an affordable, clean energy for communities across California. Propane is non-methane and provides residents with a reliable, non-toxic energy source at a cheaper rate than electricity. The advent of renewable propane has also dramatically changed propane's value proposition. As the California Energy Commission and Council continue to develop building decarbonization strategies, WPGA hopes the Council will recognize the role that both propane and renewable propane can play in reducing greenhouse gas emissions in the building sector.

WPGA also has concerns with the cost effectiveness study that a number of local cities across California are using to adopt Reach Codes. The data in the study we have seen thus far does not appear to calculate the true cost of plumbing a house with propane. There is no substantial cost differential between building with propane in comparison to electric, especially once you factor in the cost of the energy. If the costs for all sectors are not analyzed in the study, it is impossible for local cities or the State to deem these efforts as truly "cost effective."

Over the past couple months, we have seen millions of Californians left in the dark and cold due to Public Safety Power Shut Offs. These occurrences, which are expected to continue for at least the next 10 years, are a prime example as to why relying on a single power source is unacceptably risky and accentuate the need for both energy diversity and resiliency across the state. Whereas, countless individuals were able to power their homes, stay warm and ensure that essential life sustaining equipment was not turned off during the shut offs because their homes were also plumbed with propane. We believe the proposed Reach Code should ensure that residents across the state have much needed access to both clean energy diversity and resiliency options.

Climate change and decarbonization is a complex challenge that requires deployment of all clean energy sources. Wind, solar, and other renewable fuels – like renewable propane – all have to factor in the equation of how to combat one of the most critical issues of our time.

The Western Propane Gas Association appreciates your work in this area and hope the Council and staff take a holistic view of the complementary role propane plays alongside decarbonization efforts including solar, wind and other renewable fuels.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Granholm". The signature is fluid and cursive, with a large initial "B" and a long, sweeping tail.

Ben Granholm
Regulatory Affairs Specialist

cc: Los Angeles City Council
Rich Llewellyn, City Administrative Officer