Dear Climate Change Commissioners:

The Plumbing Heating Cooling Contractors of California (PHCC of CA) appreciates the opportunity to comment on the Mayors’ Commission on Climate Change Report. There are over two dozen PHCC of CA members in the Sacramento region and PHCC of CA’s public policy platform holds a core belief of consumer protection and advocating for a reasonable regulatory environment and a healthy California economy. As such, for the following reasons, we oppose the Built Environment proposals:

- Mandate all-electric construction to eliminate fossil-fuel use in new buildings by 2023; and
- Electrification of Existing Buildings Transition 25% of existing residential and small commercial buildings to all-electric by 2030.

While the objective of carbon-neutral energy production is laudable and well-intended, it is apparent to PHCC that decarbonization policies do not take into consideration the consequences of outright bans on natural gas usage. Consumers deserve a choice in the provider of their energy, fuel gas should remain an efficient option.

If government officials mandate a forced conversion to electric appliances in existing structures, low-income households would be impacted the hardest. Replacement costs for furnaces, water heaters, and other fixtures coupled with increased operating costs would be burdensome for the disadvantaged. Electrification could increase the average residential household-energy related costs by almost 50%.

Small businesses such as food service establishments would pay much more for electricity, considering the energy-intensive equipment they use for food preparation. The cost of new homes would also increase because they would need to be wired at a much higher amperage than would otherwise be required to accommodate all energy-intensive appliances and fixtures.

The existing capacity of solar and wind farms is not sufficient to power the grid exclusively on these technologies, nor is adequate infrastructure in place. Shifting to 100% electricity dependency, especially when wind and solar infrastructure is not in place, will stress electric grids while increasing both energy costs for consumers and the carbon impact on the environment.

Power line transmission losses (i.e., the loss of energy as electricity travels further down a power line, requiring additional electrical substations to ensure continuity of electricity from a power plant to a dwelling) makes fuel gas up to three times more efficient than electricity. Natural gas is an affordable energy source that keeps electric bills low, has low carbon emissions, and reduces the overall use of electricity, which in turn reduces reliance on the more carbon-dependent energy sources that generate electric power.
The plumbing and HVAC contractors of PHCC understand their responsibility as stewards of the environment. PHCC believes the State and region can achieve a healthier environment by reducing carbon emissions generated by fossil fuels for electricity while allowing consumers to choose natural gas to offset electric costs and maintain a high quality of life.

Sincerely,

[Signature]

Deborah K. Maus, CAE
Executive Vice President

cc: Mayor Christopher Cabaldon, City of West Sacramento
    Mayor Darrell Steinberg, City of Sacramento
    Executive Director, Kate Meis, Local Government Commission