



October 15, 2019

Steven Scharf, Mayor
City of Cupertino
Attn: Cupertino City Council
10300 Torre Avenue
Cupertino, CA 95014
sscharf@cupertino.org

SUBMITTED VIA EMAIL

RE: City of Cupertino Development of Reach Codes

Dear Mayor Steven Scharf:

Thank you for the opportunity to comment on the City of Cupertino's proposed Reach Codes aimed at reducing greenhouse gas emissions in the building sector. The Western Propane Gas Association (WPGA) seeks to be a valuable contributor in both the development of these codes and the policies and procedures that may emerge as a result of these discussions.

While we applaud efforts for building decarbonization, WPGA believes that Reach Codes disincentivizing propane as a complementary fuel source to electric are fundamentally misguided. WPGA hopes that regulators will look to the example that the City of San Luis Obispo is setting with the development of their Reach Codes and recognize the value that propane provides on a number of levels.

Propane provides affordable, clean energy for low income communities as well as a vital back-up power for solar powered homes when battery power is low. Disincentivizing propane as a complementary power to solar has an unintended consequence to make solar homes more expensive and less reliable when power generation is not at peak levels.

Furthermore, there has been numerous discussions throughout California regarding planned power outages and safety black-outs. In a recent article published by Politico ([PG&E begins massive power shut-off in California to avoid wildfires](#)) it is noted that the Public Safety Power Shutoff could affect 2.4 million electricity users. Propane delivers energy resiliency for communities facing safety black-outs which can be critical for those powering life-sustaining equipment. Vulnerable citizens such as people on dialysis or simply the many individuals using electric powered wheelchairs can use propane energy for reliable power.

When looking towards the future, our industry is investing in renewable propane, derived from sustainable sources like beef tallow or vegetable oil. We hope that regulators take a more holistic view of the complementary role propane plays alongside decarbonization efforts including solar, wind and other renewable fuels.

The Western Propane Gas Association appreciates your work in this area and looks forward to working with you as the City of Cupertino and the State strive to reduce greenhouse gas emissions through comprehensive clean energy solutions.

Sincerely,

Ben Granholm
Regulatory Affairs Specialist

cc: Andre Duurvoot, Sustainability Manager

From: [Scott Shell](#)
To: [City of Cupertino Sustainability Commission](#)
Subject: electrification reach code
Date: Tuesday, October 22, 2019 9:43:09 AM

Dear members of the Cupertino Sustainability Commission,
 I am unable to make your meeting on 10/24, but would like to encourage you to recommend an electric reach code that requires electric heating and hot water as your peer cities are doing. These appliances are ~90% of residential gas use, and are the most expensive and difficult to retrofit later. Exceptions can be allowed for cooking if desired, and if a stove is pre-wired, no retrofit is required—just replace the appliance.
 I also encourage you to apply the ordinance to ALL buildings (with exceptions for specific building types if required).
 San Francisco reports that 97% of their new residential units have been in high rise residential, so these projects need to be included as well as commercial.
 Thank you for all your work on this key issue.
 Scott

City	Status	Encourage Gas Reduction		Require Gas Reduction		EV Infrastructure		
		High Reach + Mostly Electric (1 + 2 + 2A)	High Reach (1 + 2)	Mostly Electric (1 + 2A)	Ban Natural Gas (1 only)	Less than Model	Equal to Model	Above Model
Monte Sereno	Evaluating	?				X		
Los Gatos	Evaluating							
Campbell	Evaluating	X					X	
Gilroy	Evaluating	X					X	
Milpitas	Evaluating	X					X	
Sunnyvale	Evaluating		X				X	
Cupertino	Evaluating		X				X	
Los Altos	Evaluating			X			X	
Los Altos Hills	Evaluating			X			X	
Mountain View	Evaluating			X				X
Saratoga	Evaluating			X				X
Menlo Park	Approved				X			
San Jose	Approved				X		X	
Morgan Hill	Evaluating				X		X	
Berkeley	Approved				X			

1 = All-Electric inside the building; gas ok outdoors.
 2 = High Reach (electric + natural gas inside), typical paired with a) pre-wiring b) increased energy efficiency, and/or c) solar thermal or battery storage
 2A = Mostly Electric: all electric required, except gas cooking and/or fireplaces allowed, + pre-wiring stove

Scott Shell FAIA, LEED® AP BD+C, CPHC®
 Principal

Pier 1 The Embarcadero, Bay 2
 San Francisco, CA 94111
 +1 415-214-7277




From: [Rand, Stephanie](#) on behalf of [Kenney, Robert](#)
To: [City of Cupertino Sustainability Commission](#)
Cc: [Berman, Janice](#); [Cline, Darin](#); [Brooks, Anna](#); [Cunningham, Kelly](#); [Kenney, Robert](#); [Andre Duurvoort](#); [Albert Salvador, P.E., C.B.O.](#); aimee.bailey@svcleanenergy.org
Subject: All-Electric New Construction Support
Date: Tuesday, October 22, 2019 3:10:05 PM
Attachments: [All-Electric New Construction Support Letter RKenney 2019 Cupertino.docx.pdf](#)

Dear Sustainability Commission,

Attached please find my letter regarding PG&E's All-Electric New Construction Support for the City of Cupertino.

Sincerely,

Robert

Robert S. Kenney
Vice President
State and Regulatory Affairs
Pacific Gas and Electric Company
P. O. Box 77000
Mail Code B23A
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(415) 973-2500 (office)




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October 22, 2019

VIA EMAIL TO: sustainabilitycommission@cupertino.org

Sustainability Commission
City Hall
City of Cupertino
10300 Torre Avenue
Cupertino, CA 95014

Dear Sustainability Commission:

Pacific Gas and Electric Company (PG&E) is proud to provide electric and natural gas service to the City of Cupertino. And we are committed to helping customers and the community achieve their energy goals. As part of this commitment, PG&E welcomes the opportunity to support the City of Cupertino's efforts to promote efficient, all-electric new construction, when it is cost-effective.

PG&E strongly supports California's climate and clean air goals. We recognize that achieving these goals requires a range of approaches and tools, including increasing the use of energy-efficient electric appliances in buildings when cost-effective. PG&E welcomes the opportunity to avoid investments in new gas assets that might later prove underutilized as local governments and the state work together to realize long-term decarbonization objectives. With all this in mind, PG&E supports local government policies that promote all-electric new construction when cost effective.

Beyond new construction, PG&E believes a multi-faceted approach is needed to cost-effectively achieve California's broader economy-wide long-term GHG reduction objectives, including both electrification and decarbonizing the gas system with renewable natural gas and hydrogen. As California's decarbonization policies evolve, PG&E will continue to ensure the safe and reliable operation of the electric and gas systems to continue supporting the customers that depend on us.

PG&E appreciates the partnership with the City of Cupertino during its policy development process, which allows us to prepare for the future and continue providing the best service possible to customers. PG&E continuously forecasts load in its service territory and implements upgrades to the distribution grid to meet the demand. PG&E fully expects to meet the needs that all-electric buildings will require. PG&E remains ready to engage with our customers, local government, businesses, and community members to meet their needs safely, reliably, affordably, and with clean energy.

PG&E looks forward to continuing to work with the City of Cupertino to accomplish its policy goals.

Thank you, and have a safe day.

Sincerely,

A handwritten signature in blue ink that reads "Robert S. Kenney". The signature is written in a cursive style with a large, prominent 'R' and 'K'.

Robert S. Kenney
Vice President

cc: Andre Duurvoort, Sustainability Manager [AndreD@cupertino.org]
Albert Salvador, Building Official [AlbertS@cupertino.org]
Aimee Bailey, Ph.D., Director of Decarbonization and Grid Innovation,
Silicon Valley Clean Energy [aimee.bailey@svcleanenergy.org]
Anna Brooks, Sr. Manager, Public Affairs, PG&E [anna.brooks@pge.com]
Darin Cline, Sr. Manager, Government Relations, PG&E [Darin.Cline@pge.com]

From: [BRUCE KARNEY](#)
To: [Andre Duurvoort](#); [Gilee Corral](#)
Cc: [REDACTED]; [Anna Weber](#); [Vignesh Swaminathan](#); [Meera Ramanathan](#); [Angela Chen](#)
Subject: Fwd: Natural Gas Cooking as a Social Justice Issue
Date: Wednesday, October 23, 2019 9:37:03 AM

For your consideration in developing the Cupertino Reach Code...

Cheers,

Bruce Karney

----- Original Message -----

From: BRUCE KARNEY <[REDACTED]>
Date: October 23, 2019 at 8:54 AM
Subject: Natural Gas Cooking as a Social Justice Issue

At last night's Mtn. View Council Meeting I heard a new argument for banning natural gas kitchen appliances in single family homes. I thought it was a rather compelling notion that other advocates might want to share with their City Councils. Credit for this idea goes to Vice Mayor Margaret Abe-Koga.

Her perspective is that if a reach code requires all-electric kitchens in new multi-family homes, but **not** in new single family homes, then it essentially is giving a "license to pollute" to only those who are wealthy enough to buy a new single family home. It gives an option to the owners of new single family that renters and condo-residents do not have. This, it is a form of discrimination based on wealth.

Rather than addressing this disparity by allowing natural gas kitchens in multi-family residences, the Vice Mayor recommended eliminating the natural gas option in new single family homes. The rest of the Council agreed, and her modification to the staff proposal was adopted on a unanimous vote. Starting in 2020, new residences in Mountain View, whether single-family or multi-family, will have all-electric kitchens.

Cheers,

Bruce Karney

Chair, Carbon Free Mountain View

From: [Rod Sinks](#)
To: [BRUCE KARNEY](#)
Cc: [Andre Duurvoort](#); [Gilee Corral](#); [Gary Latshaw](#); [Anna Weber](#); [Vignesh Swaminathan](#); [Meera Ramanathan](#); [Angela Chen](#)
Subject: Re: Natural Gas Cooking as a Social Justice Issue
Date: Wednesday, October 23, 2019 10:42:44 AM

Yes, I watched the meeting and have asked for a written summary of Mountain View council's actions. They also mandated electricity in commercial kitchens, with a waiver process to allow exceptions for preparing cuisine when there is no electric option (like Menlo Park).

I think it would be useful for the Sustainability Commission and the Council to understand what actions Mountain View, Menlo Park and San Jose have taken.

Rod

On Wed, Oct 23, 2019 at 9:37 AM BRUCE KARNEY <[REDACTED]> wrote:

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