



Friday, February 2, 2018

Honorable José Huizar
Honorable Bob Blumenfield
200 N. Spring St.
Los Angeles, CA 90012

Re: Council Motion 18-0002-S7 - Moratorium on Gas Hook Ups

Dear Honorable Councilmembers Blumenfield and Huizar,

On behalf of thirteen organizations and businesses, we submit these comments on Motion 18-0002-S7, which addresses the California Public Utilities Commission's (CPUC) proposed moratorium on gas hook-ups in new commercial and industrial construction. Opposing the CPUC's proposed moratorium cannot be the only action the City Council takes on this important matter. Rather, the proposed moratorium, though short in duration, must serve as a call to action for the Southern California region to begin reducing our reliance on gas.

If the City of Los Angeles is to act on its commitment to climate change and healthy air, and respond to the ongoing challenges posed by our reliance on gas, then the City of Los Angeles must take strong action now to reduce our dependence on gas.

We strongly urge the Council, as it considers a response to the CPUC, to show leadership to prevent future gas reliability, safety, and environmental risks by taking steps to proactively reduce our reliance on gas in homes and buildings wherever possible, and accelerate a transition to clean, climate-friendly electric buildings.

Since the massive leak at Aliso Canyon in October 2015, further events have only reinforced the problems which come from our reliance on natural gas. For example, a natural gas odorant leak in West Los Angeles on November 29th, 2017 created confusion and concern for public safety. Weeks later on December 18th, 2017, another leak was reported at Aliso Canyon, leading to 34 reports of headaches, nosebleeds, and burning in the eyes or throat.¹ The recent wildfires also prompted safety concerns and required shutting off gas service in some parts of the region.²

The Huizar Motion could be improved by refocusing the City Council's attention to activities under its jurisdiction to proactively respond to the ongoing gas reliability and safety issues, rather than waiting on the CPUC to consider alternative mechanisms to mitigate gas usage.

The City has historically been a leader in actions to reduce air pollution and greenhouse gas emissions by encouraging energy efficiency and renewable energy deployment. Having its own municipal utility, the City is in a strong position to go further to manage a much needed shift from natural gas to safe, reliable, all-electric buildings powered by local clean energy.

At a high level, the LA City Council should instruct LADWP and the Building and Safety Department to evaluate the measures needed to reduce dependency on natural gas and encourage the use of high efficiency electric appliances in new construction, major retrofits, and existing buildings.

Specifically, we recommend that the City Council:

1. Direct LADWP to establish building electrification targets in the 2018 Integrated Resource Plan to reduce greenhouse gas emissions from energy use in all residential, commercial, and public buildings by at least 45 percent below 1990 levels by 2030 to align with the City's Greenhouse Gas Reduction Goal.
2. Direct the Building and Safety Department, in consultation with LADWP, to report back within 30 days on the code changes necessary to require new residential and commercial buildings to be, at a minimum, "electrification ready" -- i.e. have electrical service and panel space capable of supporting high efficiency electric space heating, water heating, cooking, and clothes drying.
3. Direct the Building and Safety Department, in consultation with LADWP, to analyze the costs and practical implications of requiring certain types or percentages of buildings to be natural gas free, including recommendations for rebate programs to lower the upfront costs of purchasing and installing high efficiency electric appliances, new electrification-friendly tariffs to support deeper integration of renewables on the grid and ensure affordability, and

¹ LA Times, [Residents report nosebleeds and headaches after new leak at Aliso Canyon natural gas facility](#), December 18, 2017.

² See: <https://www.socalgas.com/newsroom/fires>

financing mechanisms to make electrification economically feasible for a broad cross-section of Californians.

We appreciate the City Council's attention to this issue, and urge the Council to take action to ensure energy reliability, to maintain local control over the City's power supplies, and to remain a leader in clean air and climate action.

Sincerely,

Evan Gillespie
Sierra Club

Adrian Martinez
Earthjustice

Alex Nagy
Food Water Watch

Michael Kadish
Grid Alternatives

Jennifer Kropke
IBEW local 11

Michelle Kinman
Environment California

Tim O'Connor
Environmental Defense Fund

Matt Pakucko
Save Porter Ranch

Dan Thomsen
Building Doctors

Marcia Hanscom
Ballona Institute

Ann Edminster
Design AVenues

Sean Armstrong
Redwood Energy

Vlad Popescu
Indivisible CA-43