

## Comment Letter #11

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Comments on your proposed 2022 Air Quality Management Plan

The AQMD has the thankless task of attempting to eliminate as many pollutants in the 4 county basin as possible, to improve the lives of the citizens. In their zeal to transition to zero- and near-zero emission technologies to meet unproven 2023 and 2032 air quality standards, they falsely assume the electric grid will continue to expand, to handle the additional loads being placed upon it.

Clearly, your plan recognizes the LA basin is a unique place for air quality management as the mountains surrounding the basin, limit and restrict the free flow of air and pollutants in and out of the basin. However, blindly accepting the air quality standards meant for cities without seeking some adjustment for our unique set of problems is counter productive. It is foolish to believe one-size-fits-all regulation is always the best path forward. But, it is wise to seek the best as an ideal to wish for.

I would ask the AQMD to take a broader perspective of the “bigger picture” and see if zero is the real number or is there a more reasoned approach in near-zero or timing to transition to a cleaner basin?

I primarily oppose the residential combustion source measures R-CMB-01, R-CMB-02, R-CMB-03 and R-CMB-04 which propose to eliminate all natural gas appliances in the home and force the replacement with electric appliances, that are usually vastly more expensive to operate. The single exception are some instant water heaters. As a citizen of this land, I believe all AQMD employees should be the first to adopt the “all electric” approach for at least 2 years before forcing it upon the public. This would allow your team to gain first hand knowledge what is in store for all the little people. *My belief is strong enough to contribute funds to an organized opposition to you plan.*

Even though the AQMD proposes a “ponzi like scheme” to force people like myself, who wish to retain gas appliances to pay fees, which will be used to fund near free appliances for others, this plan will cause enormous economic difficulty for the public, just to replace the appliances. This is because many homes are not designed to handle the extra high-current loads of ranges, ovens, dryers, space heaters and water heaters, all on at the same time. Therefore, the true cost will include an electric service upgrade to at least a 200-250 amp meter box, main and many additional breakers & circuits to the new appliances. Will the AQMD be subsidizing these \$5,000 to \$10,000 costs per home also?

In addition, consider the cost to operate, as a customer of Southern California Edison, my current everyday electric rates average \$0.51 per KWh from 4 to 9 PM daily, when average people come home from work. All other times average \$0.21KWh. This price for energy is vastly greater than the cost of natural gas. This cost is expected to rise at least 10% annually, over the next decade.

Now back to the power grid. Please consider the current shift of passenger vehicles from gasoline to electric. I am an engineer and I can tell you the existing electric grid can just barely accommodate the increase of load from thousands to millions of electric vehicles charging, mostly between 4 PM and 7AM. These vehicles consume more power than several major appliances on at once. Usually around 8KW for 3 to 7 hours, depending upon driving needs. This load can be reduced and managed over a longer period, but a Smart Grid is only talk at this point, so real high-current loads will unexpectedly drop-on and drop-off the grid for another decade or more, causing great instability in the grid. *Many people will wake to learn there was a power outage overnight and their car still has a low battery, making it unable to transport them to work.*

To get an idea of the probable shift awaiting the grid, I suggest you determine the amount of gasoline sold in the region on an average day. Convert that into an energy metric such as BTU. Then compare that to the amount of electrical power in peak demand KW and Kwh over a day during driving times and ask if DWP or SCE can handle that increase over the next 10 years. ***As the operators of the electric monopoly, they will assure you, they have a plan for everything.*** Now consider adding the load you are proposing to the grid, *by eliminating all commercial & residential natural gas use*, along side of the EV demand.

Keep in mind, DWP and SCE are primarily in the business of “distributing” electric, not generating power. Many of the power generation plants were sold years ago. Even so, your L-CMB-06 proposal in the same plan will severely restrict new power plants required to generate the power, needed to replace all the gasoline and natural gas being currently used by the public. Who will invest in a power plant that is destined to be shut down ASAP. **Remember, somewhere there must be a power generator, using the same or more energy as the amount of gasoline and natural gas being replacing. Electricity is only a transportation medium for energy, like a water pipe is for water.**

Our cleanest solution is either using the natural gas you are taking from the public and burning it outside the basin or using nuclear power, which is highly unlikely due to public misinformation.

This proposal of yours is years ahead of the infrastructure required to support such a plan. The grid will barely be able accommodate the EV scheme, if at all. What you will force upon the public is constant and reoccurring power black-outs for years, with tens of thousand of people reverting to use of small generators which will cause far more pollution than what you will gain from this effort to get ever closer to the magic number of zero. Zero is a tough number to reach.

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