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To Whom it May Concern:

This letter is to strongly oppose the adoption or approval of Proposed Amended Rules 1111 and 1121.

These proposed changes would require homeowners and multifamily operators to replace natural gas furnaces and water heaters with electric water heaters and furnaces to lower NOX emissions. These rules will impose extensive costs and unnecessary burden to homeowners and multifamily operators. Further, this will have a minor effect on the goal of improving air quality in the South Coast Air Basin.

We own a single family home and multifamily properties in the South Coast Air Basin. All were built in the 1960s and most rely on natural gas for hot water and heat. Given the age of construction, the properties do not have the infrastructure to support this proposed change without significant electrical work. For most homeowners, the cost to switch to all electric powered appliances is prohibitive as it would involve upgrading the electric panel as well as wiring within the structure. It would also significantly increase the cost to run these appliances as California currently has the highest electric costs in the United States.

For Multifamily operators, we are already struggling to control costs to maintain quality housing at an affordable price. The additional costs to retrofit and install electric appliances will financially burden property owners and we will be unable to meet the required habitability requirements under California Civil Code section 1941.1. Under this code, landlords are required to provide interior heat to maintain a minimum interior temperature of 55F as well as provide a constant and reliable source of hot water for domestic use. The total reliance on electricity as the only source of energy for all appliances puts our residents at risk when we have power outages or lack of adequate electric supply, which happens during the summer months in particular.

While the push to move everyone to electricity is couched in the belief that it will improve air quality, it forces everyone to be reliant on one form of energy, and due to the supply/demand for electricity as the only acceptable source of energy to power homes and businesses, will likely significantly increase costs of the energy supply. The long-term financial burden of these rules is undefined, and likely unacceptable.

The Legislative Analyst's Office reported California's electricity rates are among the highest in the U.S., with residential electricity rates nearly double those across the nation. The Legislative Analyst's Office warned that the significant increases in electricity rates may continue to burden customers. (Source: <https://www.ocregister.com/2025/01/07/pge-power-energy-electric-california-economy-bill-fire-green-newsom/>)

Further, electricity generation is not net zero with regard to NO_x or carbon emissions, so what is the point of forcing electrical appliances on the public when the means of creating that electricity isn't NO_x or carbon neutral?

If the AQMD's true goal is to improve air quality, then they should direct their energy on improving public transportation in the Southern California Basin to reduce vehicular traffic and subsequent air pollution. The primary source of carbon emissions and NOX is from truck and ship engines burning fuel, not home appliances (AQMD's AQMP, 2022).

In addition, the electric grid in California is not reliable, especially during the Santa Ana wind conditions when the risk of fires forces the utility companies to shut off power. So homes and businesses would be without heat or hot water during these outages?

If the AQMD wishes to adopt such an ordinance, then I propose that the AQMD make funds available to cover the cost for such conversions. Forcing homeowners to change natural gas appliances to electric hot water and furnaces and shoulder the costs to convert and incur higher electricity costs will force more people to sell their homes and leave the state. We are seeing more residents leave the state now due to the high cost of housing. These proposed changes will only accelerate the exodus from the state and increase the cost of housing. Again, if AQMD chooses to move forward with these rule changes, they should provide funds equal to the cost of retrofit to every property that will need to be retrofitted under the adopted rules.

For these reasons and more I am highly opposed to these proposed rules and ask that they not be adopted until the AQMD has developed a way to help pay for the financial burden these changes would impose on property owners in California.

Regards,

A handwritten signature in black ink, appearing to read "Katherine J. Johansen", with a long, sweeping flourish extending to the right.

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