



June 3, 2025

The Honorable Vanessa Delgado, Chair & Members of the Governing Board  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

**OFFICERS**

*President*  
**Tim Hepburn**

*1<sup>st</sup> Vice President*  
**Ed Reece**

*2<sup>nd</sup> Vice President*  
**Cory Moss**

*3<sup>rd</sup> Vice President*  
**Michael Allawos**

**MEMBERS**

*Alhambra*  
*Arcadia*  
*Azusa*  
*Baldwin Park*  
*Bradbury*  
*Claremont*  
*Covina*  
*Diamond Bar*  
*Duarte*  
*El Monte*  
*Glendora*  
*Industry*  
*Irwindale*  
*La Cañada Flintridge*  
*La Puente*  
*La Verne*  
*Monrovia*  
*Montebello*  
*Monterey Park*  
*Pasadena*  
*Pomona*  
*Rosemead*  
*San Dimas*  
*San Gabriel*  
*San Marino*  
*Sierra Madre*  
*South El Monte*  
*South Pasadena*  
*Temple City*  
*Walnut*  
*West Covina*  
*First District, LA County*  
*Unincorporated Communities*  
*Fifth District, LA County*  
*Unincorporated Communities*  
*SGV Water Districts*

**RE: Proposed Amended Rules (PARs) 1111 & 1121**

Dear Chair Delgado and Governing Board Members:

On behalf of the San Gabriel Valley Council of Governments (SGVCOG), I write to you regarding Proposed Amended Rules 1111 and 1121. SGVCOG is committed to working with South Coast AQMD and other partners to ensure that our residents and small businesses have access to safe, efficient, and affordable home and water heating appliances that equitably meet their needs as well as those of the region. The SGVCOG appreciates the commitment of SCAQMD staff and the Board to these shared goals in the proposed amended rulemaking process. It is critical to ensure that the needs of residents and local businesses are considered as SCAQMD adopts and implements these rules.

At the direction of the SGVCOG's Energy, Environment & Natural Resources Committee and Governing Board, we respectfully request SCAQMD address the following topics and recommendations in the Rulemaking process and implementation of PARs 1111 and 1121.

- **Affordability:** The Energy, Environment & Natural Resources Committee expressed concerns about affordability to residents and businesses that would be converting natural gas appliances to all electric. In addition, the Committee cited concerns around utilities costs for both residents and businesses who have converted to all electric appliances. The Committee recognizes the efforts that SCAQMD is doing with the future launch of the GoZero Pilot Program, a pilot incentive program for zero-NOx emission space and water heating appliances for residents and small businesses to adopt zero-NOx emission space and water heating appliances. The Committee recommends that there be incentives and rebates for residents and businesses switching to all electric appliances and that SCAQMD work with utilities such as SoCal Edison and/or SoCalGas to make this transition affordable to consumers.
- **Consumer Choice:** The Energy, Environment & Natural Resources Committee expressed concerns around consumer choice for both residents and businesses. The Committee emphasized that it is the consumers choice on whether they should convert from natural gas appliances to all electric and maintain that freedom of choice. In addition, the Committee expressed concerns regarding manufacturers of gas appliances that would be forced to comply with requirements outlined in PARs 1111 and 1121 that would result in the costs for those requirements to trickle down to consumers. Therefore, the Committee recommends that SCAQMD not require a mandate for residents and businesses to convert to all electric and leave the option to consumers where applicable.

- **Grid Reliability & Energy Storage:** The Energy, Environment & Natural Resources Committee discussed concerns around grid reliability and energy storage and whether the electric grid would be able to sustain residents and businesses transition to all electric appliances such as heat pumps. Therefore, the Committee recommends that SCAQMD consider the demand on the grid caused by incentivizing increased purchase of electric appliances in their decision-making process.

We urge SCAQMD to address the following topics and recommendations in the Rulemaking process and implementation of PARs 1111 and 1121. Thank you for your consideration.

Sincerely,



Marisa Creter  
Executive Director  
San Gabriel Valley Council of Governments