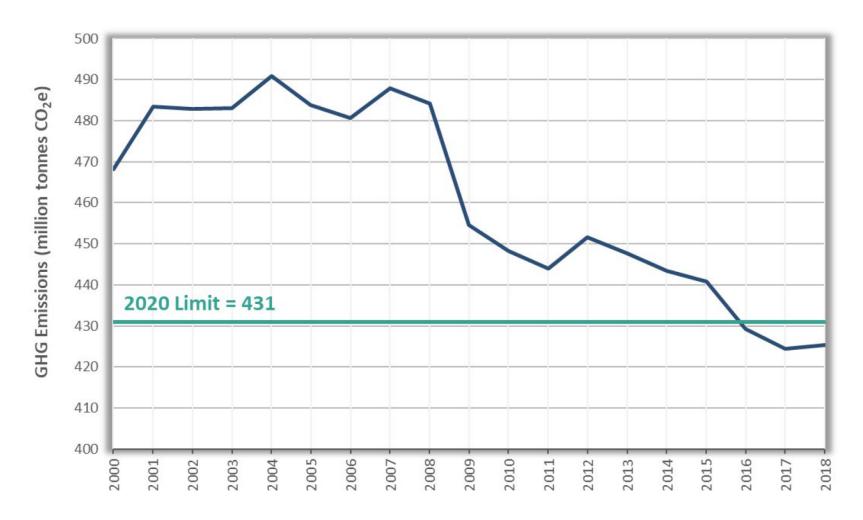


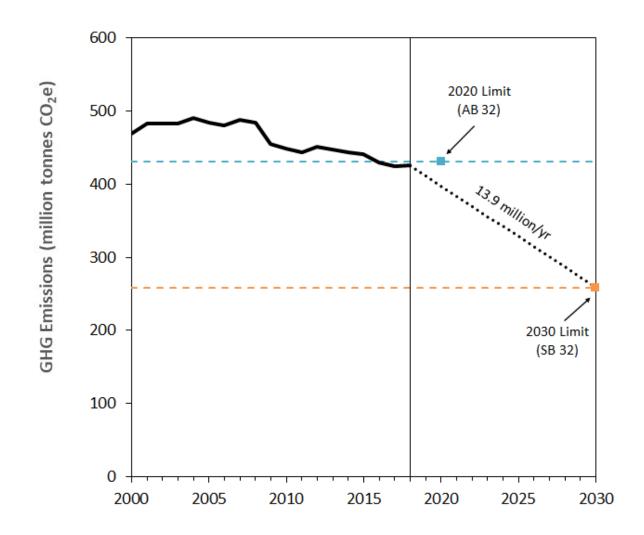
CALIFORNIA'S EMISSIONS PROGRESS



Source: ARB 2020 GHG Trends Report

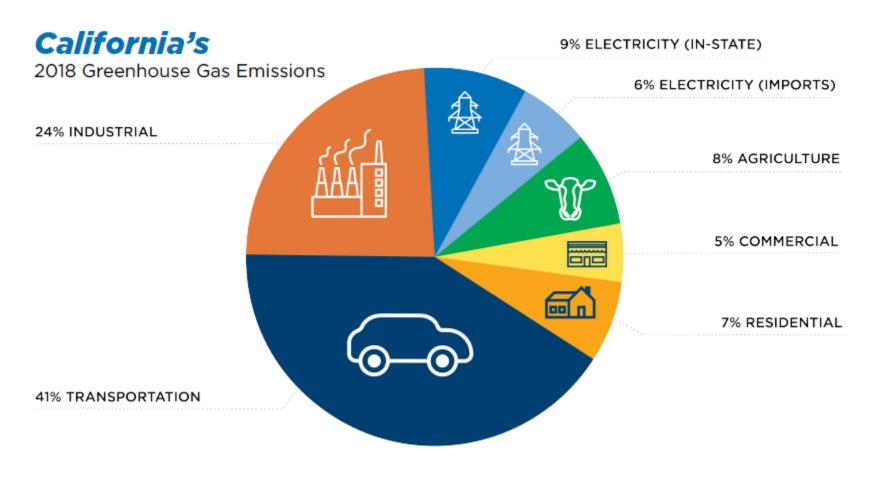


CALIFORNIA'S EMISSIONS PROGRESS





CALIFORNIA'S EMISSIONS BY SECTOR

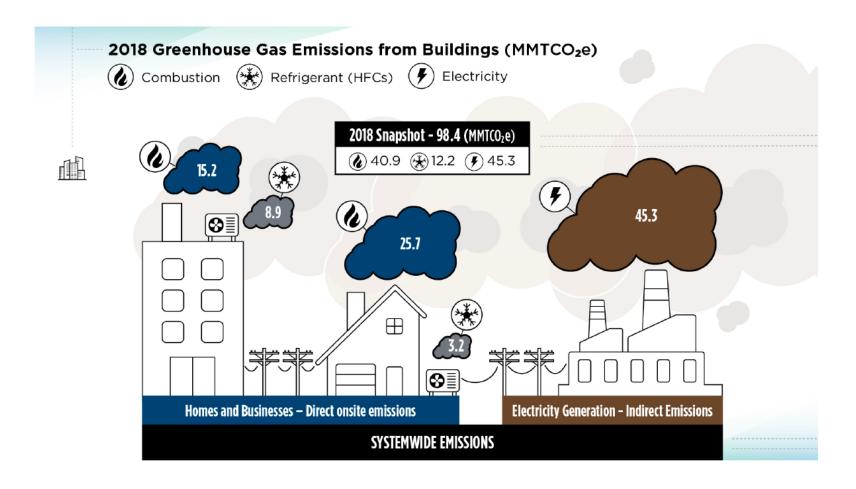


Source: California Air Resources Board

Source: 2021 SB 100 Joint Agency Report



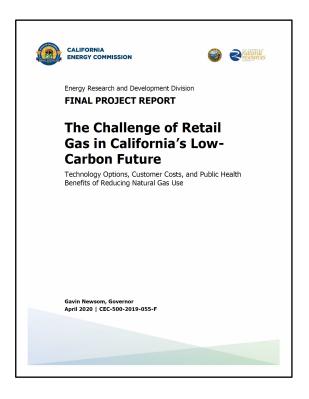
BUILDING DECARBONIZATION AND NATURAL GAS

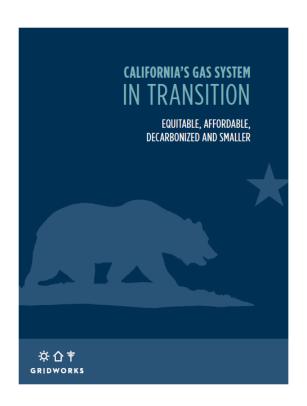


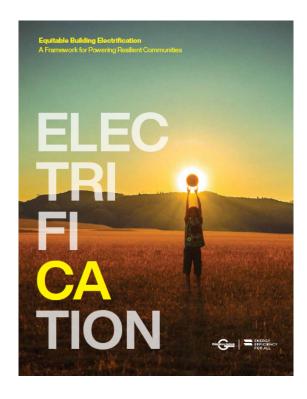
Source: 2021 CEC Draft California Building Decarbonization Assessment



BUILDING DECARBONIZATION AND NATURAL GAS

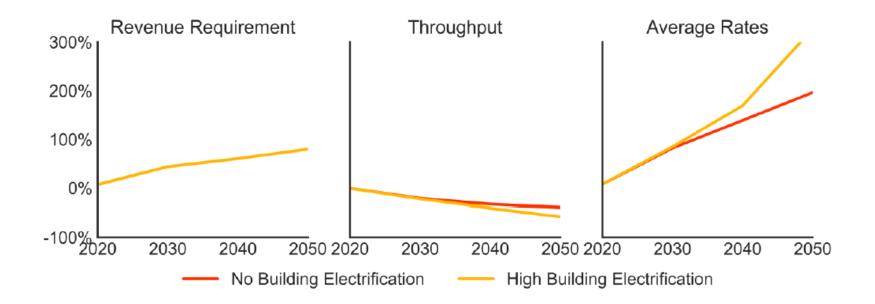








NATURAL GAS RESIDENTIAL RATES



Source: E3/CEC Challenge of Retail Gas Final Report



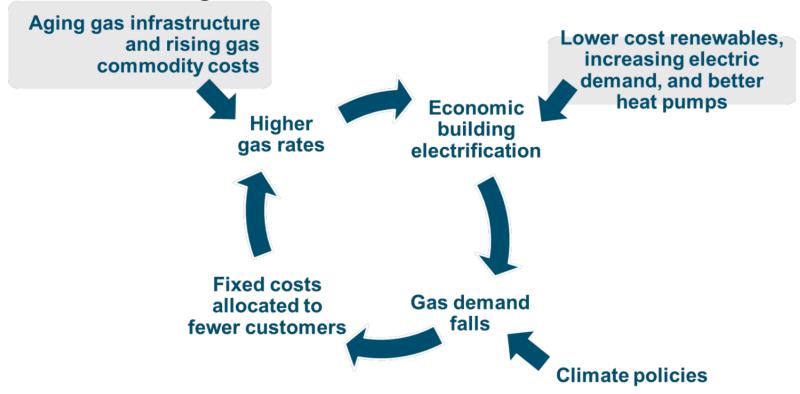
COSTS REFLECT NECESSARY SAFETY INVESTMENTS





EFFECTS OF BUILDING DECARBONIZATION ON RATES

Figure ES-1: Outside Forces in the Natural Gas Delivery Sector Could Lead to Lower Gas Demand and Higher Rates in Future Greenhouse Gas Reduction Scenarios



Source: E3/CEC Challenge of Retail Gas Final Report

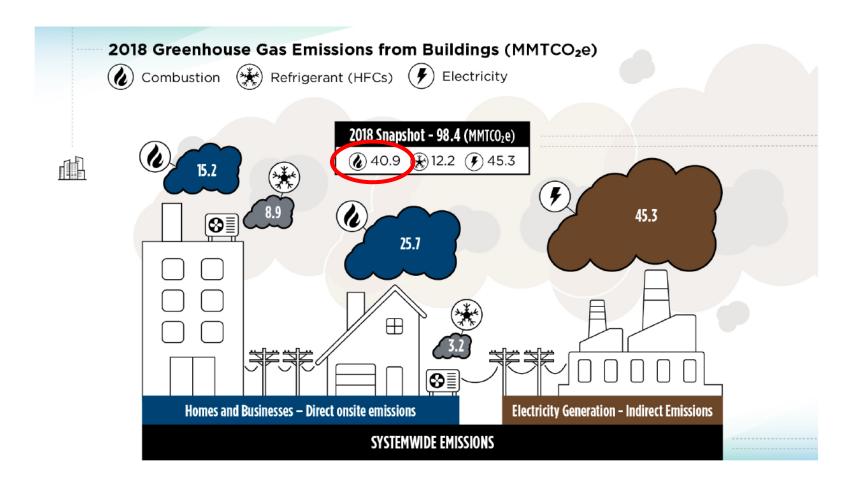


MODELING APPROACH—RATES

Four components of total \$/therm rate: Distribution Charge Transmission & Storage Charge Greenhouse Gas Adder -Commodity Charge •



MODELING APPROACH—EMISSIONS



Source: 2021 CEC Draft California Building Decarbonization Assessment



SCENARIOS: REFERENCE CASE

No specific additional policy is undertaken to reduce natural gas usage or emissions.





SCENARIOS: TITLE 24

Electrification incentives curb consumption from 2023-2026, a statewide moratorium on natural gas hookups in all new construction takes effect from 2026 onwards.





SCENARIOS: RNG

The concentration of Renewable Natural Gas is increased by 2% per year beginning in 2021, reaching 20% RNG by 2030.





SCENARIOS: APPLIANCE BAN

Beginning in 2026, the sale of new gas-fueled appliances is prohibited, resulting in phase-in of electric equivalents.





SCENARIOS: APPLIANCE BAN

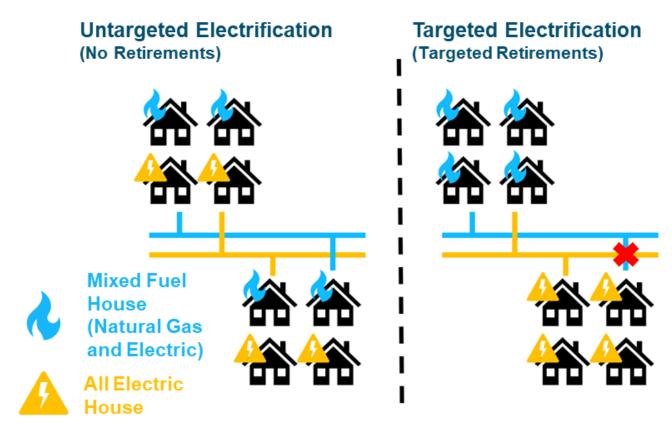
Figure C-30: Business-as-Usual Case Gas Consumption in 2030 Business-as-Usual (6159 MM Therm) 3% 13% □ Commercial AppPlug ■ Commercial FoodServ 32% ■ Commercial HVAC □ Commercial Miscellaneous 13% ■ Commercial WaterHeat ■ Residential AppPlug 4% ■ Residential HVAC 1% ■ Residential Miscellaneous 8% ■ Residential WaterHeat 26%

Source: CEC Staff



SCENARIOS: BRANCH PRUNING

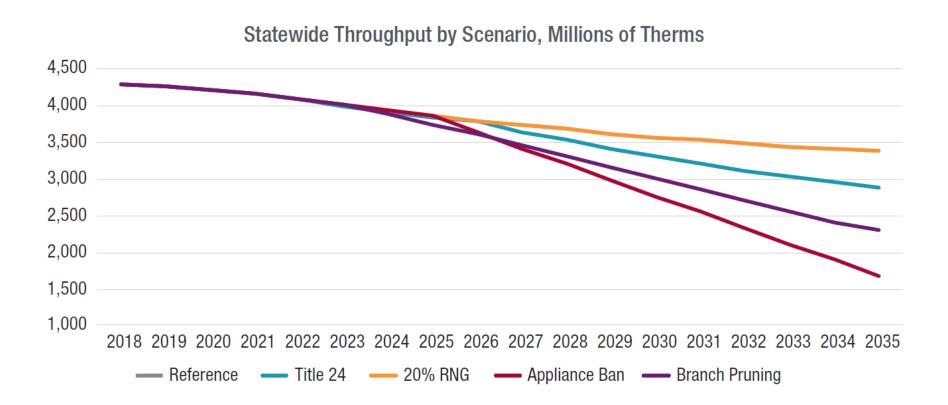
From 2023 onwards, strategic retirements of distribution infrastructure assets begin alongside targeted electrification.



E3/CEC Challenge of Retail Gas Final Report



FOUR ILLUSTRATIVE MITIGATION SCENARIOS

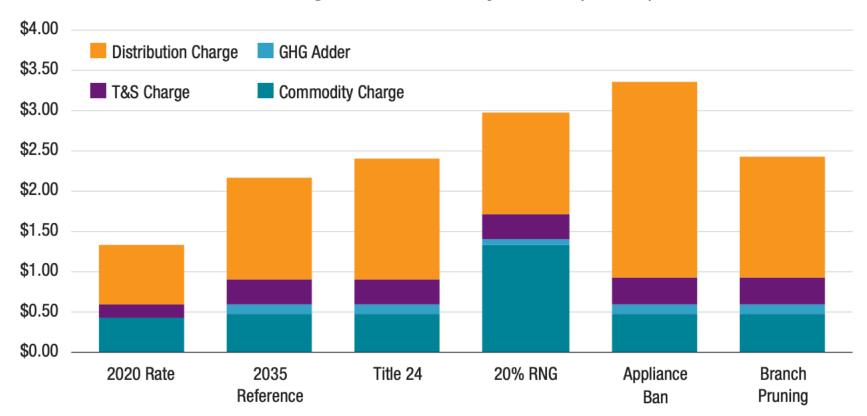


Source: Ong, Mastrandrea, and Wara, 2021



RESULTS: RATES

2035 Average Residential Rate by Scenario (\$/therm)



Source: Ong, Mastrandrea, and Wara, 2021



RESULTS: EMISSIONS

60%

50%

40%

30%

20%

10%

0%

Emissions Decrease Relative to 2035 Reference (%)



Source: Ong, Mastrandrea, and Wara, 2021

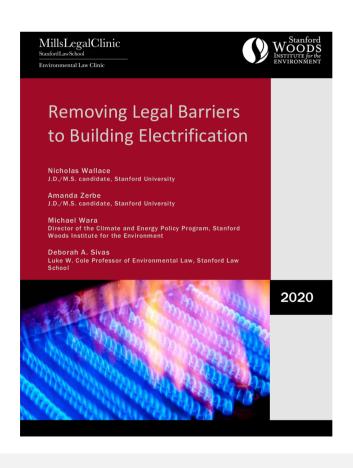


CONCLUSIONS

- 1.Building decarbonization policy decisions can result in large and wide-ranging impacts
- 2.Cost of near-term safety investments is substantial
- 3. Policy focused on new construction has modest impacts on rates and GHG emissions
- 4.Strategic electrification may enable favorable outcomes, but also entails several challenges.



LEGAL AND POLICY BARRIERS TO BRANCH PRUNING



 Co-authors: Nick Wallace, Amanda Zerbe and Debbie Sivas

Substitution of service

Substantive barriers

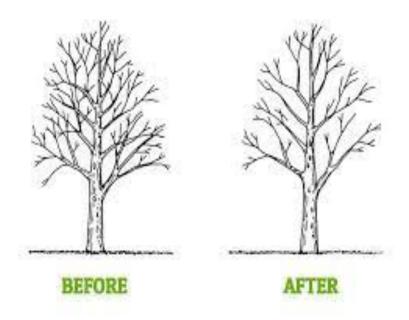
Procedural requirements



LEGAL AND POLICY BARRIERS TO BRANCH PRUNING

Successful branch pruning requires...

- Substitution of alternative energy service;
- 2. Abandonment or removal of infrastructure;
- 3. Finality for utilities





SUBSTANTIVE ISSUES: THE OBLIGATION TO SERVE

- Utilities are obligated to provide just and reasonable service to all customers (Ca. Util. Code Sec. 451).
- When can a utility substitute one service for another?
- What about holdouts?



Golden Gate Transit – buses and ferries



PROCEDURAL ISSUES: THE RIGHT OF DUE PROCESS

- Utility service is essential;
- Constitutional protections on deprivation/alteration of essential government services;
- Norm of participatory, community-driven decision making on energy transition.

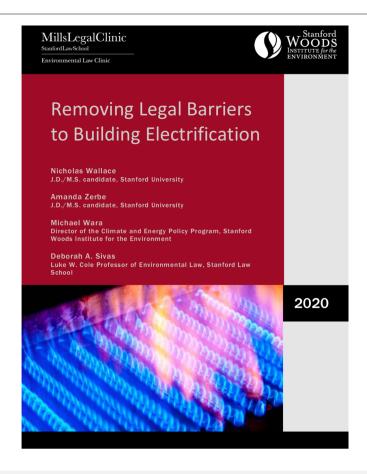


San Joaquin Valley Energy Pilots, 2018



POLICY PROPOSALS

- Clarify CPUC clear statutory authority to manage decarbonization including electrification;
- 2. Clarify CPUC authority regarding changes to utility service territory;
- 3. Clarify utility option to substitute electric for natural gas service.





CONCLUSIONS

- Transitioning from mixed fuel to all electric requires legal certainty;
- Authority is (somewhat) unclear;
- Even with clear legal authority, attention must be paid to due process rights;
- Getting substance and process right is key to a just transition!

