

DOCUMENTS IN THIS PACKET INCLUDE:

LETTERS FROM CITIZENS TO THE
UTILITIES ADVISORY COMMISSION

From: [E Nigenda](#)
To: [UAC; Batchelor, Dean](#)
Subject: Long power outages after disasters aren't inevitable – but to avoid them, utilities need to think differently
Date: Friday, November 5, 2021 6:54:00 AM

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Dear Utilities Director and Commissioners,

Palo Alto Utilities did very well with keeping the power on during our last atmospheric river. Kudos for that!

In light of all the recent long-term outages in many parts of the country, it is essential to plan for such a possibility in Palo Alto. Seth Blumsack, Professor of Energy and Environmental Economics and International Affairs, Penn State has some recommendations in this article: [Long power outages after disasters aren't inevitable – but to avoid them, utilities need to think differently.](#)

"Planning properly for resilience to extreme weather events requires doing some things differently.

First, it means realizing that a lot of equipment in the same place will be affected all at once. One reason that Ida led to such large blackouts in New Orleans was that some older transmission lines going into the city hadn't been upgraded to withstand more severe weather, even though they ran beside new equipment.

Second, the goal should be to get people the services that they need, not necessarily to keep the grid up and running, which is very costly and just won't be possible in all circumstances.

This means thinking about solutions outside of the traditional utility business model – for example, deploying lifeline systems such as solar panels, batteries or generators.

Third, it's time to acknowledge that the risks of extreme events are increasing faster than many utilities have been adapting their plans."

Thank you for considering my comments,
Esther Nigenda

From: [David Coale](#)
To: [Council, City; Shikada, Ed](#)
Cc: [UAC; Planning Commission](#)
Subject: Don't Choose Extinction!
Date: Monday, November 8, 2021 2:03:59 PM

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Hi Mayor, Council members and Staff,

I will be brief: Don't Choose Extinction! Please view this short video

<https://www.youtube.com/watch?v=VaTgTiUhEJg> (2:30)

Another way to put this is: Business As Usual will kill us all. No BAU!

We must Build Back Better and Uplift Local. We must address climate change whenever possible. What does this mean for Palo Alto?

The SCAP is a good start for BBB and UL, but it is happening at BAU pace such that we are more than 10% off our goal and we have no programs operating at scale that can help us meet our goals. We need to ramp this up faster than Staff's current timelines.

Other examples:

- Opening University Ave to cars is BAU. Making it bike/ped/people friendly is BBB and UL.
- Closing the crossing at Churchill Ave. is BBB and UL. Both the Comp Plan and the SCAP say we need to reduce car use – so let's start here. It is also the least expensive and destructive to our neighborhoods and the XCAP has agreed with this choice.
- No more City parking lots. This is against the SCAP and Comp Plan and encourages car use.
- The new bike bridge over 101 is a good example of BBB and UL but it was done at half speed and much greater cost i.e. BAU.

For all City expenditures, policy decisions, and capital improvement projects, climate change must play a much larger roll in how these decisions are made.

Please always include climate change as a top driver/consideration for all actions you make to govern our city, otherwise you are favoring the fate of the dinosaurs on us. Please don't subsidize our extinction. Always choose Built Back Better and Uplift Local.

Sincerely,

David Coale

Barron Park

From: [Daniel Dulitz](#)
To: [UAC](#)
Cc: city.council@cityofpaloalto.com
Subject: UAC public comment on utility reliability
Date: Wednesday, November 10, 2021 4:12:03 PM

Some people who received this message don't often get email from dulitz@gmail.com. [Learn why this is important](#)

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3995 Page Mill Road
Palo Alto, CA 94304 [mailing address Los Altos, CA 94022]
10 November 2021

Dear Chair Forssell, Vice-Chair Segal, Commissioners, and Staff,

I write to augment Director Batchelor's report to the UAC on November 3rd about the twelve hour Public Safety Power Shutoff that was instituted for the Foothills on the 19th of October.

First, I want to express my appreciation for the foresight and planning that has gone into the PSPS decision process. A wildfire would be catastrophic in many ways and an occasional, well-targeted PSPS is an appropriate price to pay to reduce their likelihood. I am also happy to report that the CPAU outage map webpage performed as advertised, indicating that there was an outage throughout the Foothills.

I am pleased to hear of Director Batchelor's efforts to institute proactive communication, for example by email, in advance of a PSPS. This is a good idea and would help affected residents mitigate the effects of any planned outage.

But there is a longer term lack of transparency around outages, particularly in the Foothills, that also manifested this time. For example, the CPAU outage webpage, <https://www.cityofpaloalto.org/Departments/Utilities/Utilities-Services-Safety/Outages>, tells us at the top that updates will be posted to @PAUtilities on Twitter in the event of an outage. But that did not happen for the 12 hour PSPS outage. 5 hours after my first tweet I did receive a reply from @PAUtilities, but even when I specifically asked for the cause of the outage I received no information. There is no indication on the @PAUtilities tweetstream that there was any outage that day at all — there are no tweets between October 6th and October 25th.

This is not an isolated incident. On July 28th the Foothills had a 5 hour outage. @PAUtilities tweeted about an ISO FlexAlert that day, but nothing about having an outage. We have had other substantial outages within the last 12 months that also went unreported on Twitter. Now Twitter is Twitter, whatever. But that is where you direct us for real-time information about outages, so you should report outage information there or direct us somewhere else.

I would like to see CPAU publish a post-mortem (or After Action Report, or whatever CPAU might call it) for each nontrivial outage that explains what happened, what was done to restore service, and whether there are any policy, infrastructural, or staffing changes that are recommended to avoid similar outages in the future or lessen their duration. I imagine that this

is being done already, outside the view of the public. It would reassure us to see meaningful artifacts from this process. We are aware that CPAU staffing of field maintenance crews is very thin, and is thankfully augmented by contractors, but we are in the dark (so to speak) about how that affects our outage frequency and duration.

To make transparency most effective, I would recommend an explicit agenda item in each UAC meeting, perhaps just before or just after the Director's Report, where staff describes each nontrivial CPAU outage since the last meeting, the corrective actions taken, and the policy choices that led to the outage. We may not be able to afford to implement the policies (such as infrastructure upgrades) necessary to eliminate most outages, but I believe UAC is the appropriate body to consider whether the right balance has been found.

Thank you for your consideration.

Daniel Dulitz

dulitz@gmail.com

Resident 2000-2002 and 2009-present

From: [Sherry Listgarten](#)
To: [UAC](#)
Subject: Permitting comment from Solar Technologies
Date: Sunday, November 28, 2021 7:07:46 AM

Some people who received this message don't often get email from sherry@listgarten.com. [Learn why this is important](#)

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Dear UAC:

Happy Thanksgiving, and holiday season more generally :)

In light of your deliberations on permitting, I thought I'd forward you this voicemail that Solar Technologies left me after I inquired on their website about their services. (They are one of the three vendors chosen to participate in the SunShares program this year.) I was surprised at how negative they were, especially given we selected them. With friends like these...

"Hi Sherry, this is XXX calling with Solar Technologies. I believe you had reached out to us on our website requesting some more information. Unfortunately we do not currently work on solar projects in Palo Alto, especially homes with flat roofs automatically get disqualified for us. They have a very difficult jurisdiction when it comes to permitting and we've found that our projects there have taken much longer than expected. It really kind of drags out our lead time which is currently over six months for installation as it is, so one way we are working to manage our lead time is not working in the Palo Alto jurisdiction. We absolutely do not install storage there and so the only projects that we're working on right now through the SunShares project are composition shingle roofs. Again, we do not install storage/batteries in Palo Alto. So if you have any questions, please give me a call."

I also generally worry about the dependency between permits and rebates. As long as the time and complexity for a permit eats up most of the rebate, which it seems to do, I'm not sure I see the point. It just aggravates the contractors. Even if we were to direct the rebate to the contractor, which is slightly better, it doesn't help much imo. Rebates need to be independent of permits, or the permit process has to be really really quick/easy.

I shared some thoughts on HPWH adoption specifically [here](#). Even highly motivated residents are struggling to get these installed.

Thanks for thinking about all of this,

-- Sherry.

From: [David Coale](#)
To: [UAC](#); [Batchelor, Dean](#); [Lait, Jonathan](#); [Hoyt, George](#); [Shikada, Ed](#)
Cc: [Abendschein, Jonathan](#); [Burt, Patrick](#); [Cormack, Alison](#)
Subject: Comments to UAC 12-1-21, Item 2, The Permitting Process
Date: Sunday, November 28, 2021 7:40:24 PM

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Dear UAC, Utility Staff, PDS Staff and City Manager,

It has now been over 8 months since PDS started to update the permitting and inspection process and while there have been some improvements, and staff has been hard at work, another major solar company involved in the SunShare program has said it will no longer work in Palo Alto due to lengthy and arduous permitting processes¹.

In the recent staff report to the UAC, the permitting times for solar with storage is again missing from the report as it was in the September 1st report to the UAC.

- Please ask Jonathan Lait to report on the permitting of solar with storage times and efforts to improve this. This is still, by far, the most egregious permitting in Palo Alto and surrounding communities (Bay Area).

There has been no mention of eliminating the Palo Alto only requirements except for the AC disconnect, which is a requirement of the Utility's. On this, director Batchelor and his staff have said there is no scientific reason for keeping the AC disconnect and then Staff resorted to scare tactics with a video they claimed was from Palo Alto when in fact it was an advertising video for arc-flash protection gear². Director Batchelor said they will not change this requirement.

At the April 7th UAC meeting a majority of the commissioners suggested "immediately suspend any requirements that aren't enforced by neighboring jurisdictions." And to "justify" any requirements that are not imposed by other jurisdictions³.

I would also like to see this along with a formal recommendation from the UAC to drop the Palo Alto only requirements. The time for discussion only on the permitting issues is over. The UAC should take a proactive roll in the permitting process.

To be clear, the Palo Alto only requirements are:

- Torque test for all mechanical solar mounting equipment.
- Torque test for all electrical connections.
- Requirement for two ground rods.
- Custom placards for PV system layout
- AC disconnect.

These are not required in our neighboring jurisdictions⁴. All except for the AC disconnect

were implemented by Palo Alto's over zealous inspector. This needs to change.

- Please ask George Hoyt if these requirements are being removed. If not, why not and to justify what problems these are solving that our neighboring jurisdictions are experiencing. If these requirements are solving some problems that our neighbors are having, by all means, keep them. If not, remove them ASAP.

- Please ask Director Batchelor to justify the AC disconnect in the same way without using scare tactics, but please list problems solved or greater safety realized as compared to other utilities.

In the September 1st report to the UAC, PDS said they would have a contractor database of the contractors that still work in Palo Alto.

- Please ask Jonathan Lait to also track, as best they can, the contractors that no longer work in Palo Alto. This is an important metric as to how well the permitting process is going. Director Lait can now add Solar Technologies to this list.

In summary, while PDS is working to "fix" the problems, they are still under reporting the solar permitting with storage and contractors are still leaving. I believe that the SolarApp+ is the best approach to solving the permitting problems in Palo Alto. NREL, who developed this application, is planning on including solar with storage and other electrification permitting. At this point Director Lait does not have a plan on how to handle the extra permits needed for Palo Alto to reach our 80 by 30 goals. I think the SolarApp+ is a good way to achieve this and take this update out of the never ending "Palo Alto Process" and to really move ahead as long as staff will not impose the Palo Alto only requirements on this application. Palo Alto needs to adopt this standard and move back to the normal permitting that our neighbors have. I would also like to see the UAC take a more active roll in guiding this process. The writing is on the wall. Please insist on removing the Palo Alto only requirements now and don't wait until this whole process is over to make changes. Permitting must be easier if we are going to meet our SCAP goals.

Sincerely,

David Coale

1 See comments to the UAC by Sherry Listgarten on 11/28/21

2 Video of the September first UAC meeting starting at minute 29:

<https://midpenmedia.org/utilities-advisory-commission-31-912021/>

Video found on the internet of electrical workers in Brazil:

<https://www.youtube.com/watch?v=Z3yKFLJpnhI>

3 See Palo Alto Weekly article: <https://www.paloaltoonline.com/news/2021/05/21/palo-alto-takes-heat-over-solar-permitting>

From: [John Sack](#)
To: [UAC](#)
Subject: Permitting and contractors in Palo Alto
Date: Monday, November 29, 2021 5:24:42 PM

Some people who received this message don't often get email from sack@highwirepress.com.

[Learn why this is important](#)

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UAC,

I've just spent the last four months trying to get a heat pump project done -- before the winter. My project requires not only an HVAC contractor, but an electrical contractor, as it turns out. Every contractor asked whether the work was to be permitted or not. And I got the sense that if it was to be permitted, they really were not interested *because working in Palo Alto is too 'expensive' for them*. I first had this experience when I installed solar panels, but it seemed that it was the inspection that was the hassle for contractors then. Now it seems like permits themselves are the problem. I can't understand the specifics, except that trades seem to say that Palo Alto is "hard to do business with".

Contractors seem to be busy, and they have choices about where they spend time. Palo Alto is not a "choice" location for a contractor.

This is particularly frustrating because Palo Alto's Council seems to want Palo Altos to "electrify" and yet the city's own reputation makes that hard to accomplish.

Please figure out how to address this.

John Sack
741 Chimalus Dr, Palo Alto, CA 94306

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John Sack,
Founding Director, HighWire Press

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From: [Don Jackson](#)
To: [UAC](#)
Cc: [Shikada, Ed](#); [Lait, Jonathan](#); [Hoyt, George](#); [Sustainability Email](#)
Subject: Comments regarding UAC 2021-12-01 agenda item #2: "Discussion and Update on the Permit Processes for Various Energy Technologies"
Date: Monday, November 29, 2021 4:11:42 PM
Attachments: [Comments regarding upcoming PTC Study Session on Furthering the Electrification of Buildings in Palo Alto.pdf](#)
[Commentsinputfeedback re Residential Building Electrification 992021.pdf](#)

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Honorable Commissioners:

Here are my comments on agenda item #2 "Discussion and Update on the Permit Processes for Various Energy Technologies"

It is not possible for me to present this information within the three minutes allowed for public comments,
so I am submitting these written comments,
which I request that you review and consider.

This is the third time this year that the UAC has addressed this topic, my assessment to date:

1. There has been no material progress on eliminating unique and onerous Palo Alto requirements for PV-panel and ESS projects, CPAU continues to maintain these requirements are absolutely necessary, despite overwhelming evidence to the contrary.
At the September UAC meeting, Director Batchelor and Mr Singh did not address/answer the specific questions by Commissioners (and in comments by David Coale and myself), and instead, resorted to "scare tactics" by showing a (highly questionable) YouTube video in order to (successfully) deflect further questioning by the Commission.
2. The City has still not adopted the standard Solar/App+ program/process (from the US Department of Energy's (DOE) National Renewable Energy Lab (NREL)).
Staff reports explaining this delay are telling:
 1. "Solar App+ reviews projects to basic code state requirements. It does not incorporate local jurisdiction regulations or utility service provider requirements.
As a full service city, Palo Alto needs to consider the implications of implementing Solar App+ and the effect it may have on the City's utility infrastructure."
 2. "Staff are continuing to work with the app creator to understand if certain planning code requirements can be incorporated into the app and it's automatic review or if the app cannot support their inclusion"

In other words, instead of eliminating and streamlining our codes/requirements/permitting,
Staff is attempting to subvert the fundamental premise of the SolarAPP+ initiative,

in order to continue its practice of mandating unique and onerous requirements.

3. In my opinion, Director Lait and his team have made sincere and significant efforts to streamline the paperwork and workflow of the building permit process this year, for which they should be commended, but fixing the process problems without removing extraneous requirements is insufficient, the only benefit is that an applicant may now wait less time to be told to revise her/his plans to address Palo Alto's unique and unnecessary requirements

I suggest that the UAC "recommend to Council" that Council should direct CPAU and Planning to:

- Eliminate all Palo Alto unique/specific Electrification requirements (i.e. the AC-Disconnect)
- Adopt and embrace SolarAPP+ **AS IS**, don't subvert the intent of a nationwide/standard process for Electrification permitting and inspection

Attached please find copies of my recent, related, comments on this (and related) topics to the PTC and the Council's SCAP Ad-hoc Committee.

In addition, I "second" the comments made by David Coale in his email to UAC regarding this agenda topic (dated 11/28).

Respectfully

Don Jackson
Palo Alto Resident
Former UAC Commissioner (6/2019-5/2021)

From: Don Jackson dcj@clark-communications.com 

Subject: Comments regarding upcoming PTC Study Session on "Furthering the Electrification of Buildings in Palo Alto"

Date: October 27, 2021 at 12:16 PM

To: Planning.Commission@cityofpaloalto.org Planning.Commission@CityofPaloAlto.org

Cc: Ed.Shikada@cityofpaloalto.org Ed.Shikada@CityofPaloAlto.org, George.Hoyt@cityofpaloalto.org George.Hoyt@CityofPaloAlto.org, Jonathan.Lait@cityofpaloalto.org Jonathan.Lait@CityofPaloAlto.org, Pat.Burt@cityofpaloalto.org Pat.Burt@CityofPaloAlto.org, Alison.Cormack@cityofpaloalto.org Alison.Cormack@CityofPaloAlto.org, uac uac@cityofpaloalto.org

Bcc: David Coale david@evcl.com, Gennady Sheyner gsheyner@paweekly.com, Tom DuBois tomforcouncil@gmail.com, Lydia Kou kou.pacc@gmail.com



Honorable Planning and Transportation Commissioners:

Herein please find my comments regarding your upcoming Study Session on "Furthering the Electrification of Buildings in Palo Alto"

As a former UAC commissioner and as a resident who has been electrifying my home via a series of projects for the last 18 months (and counting!), I have studied the City's electrification related codes, requirements, and permitting in detail, and I have direct personal experience with them.

Many residents (myself included) and contractors feel that the City's current code, requirements, and permitting process for electrification technologies are excessive, onerous, and unnecessary, and are in direct conflict, and are an impediment to, the City's sustainability and carbon-reduction goals. Some of these issues are described reasonably well in a [recent newspaper article](#).

The Staff report for your study session provides both descriptions of current planning policies, and poses questions regarding potential revisions to these policies.

In the table summarizing "Current Planning Review for Clean Energy Technologies", regarding Solar Panels, it states "(1) If installed a few inches from the roof, no planning review required".

I do not understand how this could be the case.

In my (very recent) permit application, with PV panels directly attached to my standing-seam metal roof (and following the contour/pitch of the existing roof exactly), resulting in the top surface of the panels being about 3 inches above the current roof, the planning department made numerous comments regarding the proposed plan, requiring at least one revision/resubmission, and the planning department further required two to three times more PV-panel to roof attachment brackets than the manufacturer of these brackets recommends and requires.

It is difficult to understand why the City imposes this additional requirement, overruling and ignoring decades of experience with this product/technology across the US, in regions with far more extreme weather (snow, wind) than we experience.

Later in the Staff report, a number of policy revisions/tradeoffs/revisions are posed.

Without getting into the details, I observe and suggest that many of these topics boil down to "which is more important, sustainable/clean energy, or some-existing-concern?"

In virtually every case, my opinion is that transitioning to sustainable, clean energy should "trump" other concerns.

If we as a planet don't do everything within our ability to slow/stop climate change, trees and their canopies are at a far greater risk, therefore we should allow reasonable tree removal and canopy trimming now to facilitate, support, and encourage PV panel installations.

There are a number of other tradeoffs not mentioned in the Staff report:

- **PV panel layout versus fire-department access to rooftop:**
Current code requires significant rooftop pathways for firefighters, at the expense of PV panel generating capacity.
In my case, these requirements/codes prevent me from adding approximately 2 kilowatts of additional PV panels.
Given the steep pitch of my metal second story roof and providing a 3 foot walkway along the roof ridge, with access to the ridge provided by the panel-free west and east roofs seems sufficient, but I was/am required to provide additional clear pathways along the north and south roofs, which limit the potential generating capacity of my panels.
Which is more important, clean energy, or unneeded pathways for firefighters?
- **Energy Storage System (ESS) Battery Restrictions:**
Current code requires that ESS batteries mounted to the exterior of a house must maintain a minimum 3 foot (measured horizontally) to any dwelling opening (e.g. window or door).
This can be an extremely onerous requirement (as it is in my case).
At the completion of all my electrification projects, I will disconnect from the natural gas system, which is a much higher fire risk to a structure than exterior batteries closer than 3ft to a window.
But this tradeoff is not taken into account when seeking a permit for an ESS.
The City's website states that interior installations of ESS batteries requires an automatic fire extinguishing system, a very onerous requirement, but EVs with far larger batteries can be parked in a garage, with no such requirement.

A number of onerous Palo Alto specific permit requirements are the result of obsolete and unnecessary interconnect requirements by the Utility department. I and others have described these in detail elsewhere, please see my comments to the UAC on this topic (attached below)

The Staff report mentions the possibility of the City's adoption of the US-DOE/NREL SolarAPP+ to streamline electrification project permitting and inspections.

Unfortunately, the planning department is completely "missing the point" regarding the SolarAPP+ program, which provides a STANDARDIZED, NATIONWIDE standard/process. Instead of eliminating extraneous, unnecessary, and onerous "Palo Alto only" requirements, as stated in the report **"Staff are continuing to work with the app creator to understand if certain planning code requirements can be incorporated into the app and it's automatic review or if the app cannot support their inclusion"**, in other words, instead of eliminating and streamlining our codes/requirements/permitting, Staff is attempting to subvert the fundamental premise of the SolarAPP+ initiative, in order to continue its practice of mandating unique and onerous requirements.

I strongly agree with and "second" David Coale's comments regarding SolarAPP+ to the PTC.

I suggest/propose that PTC provide the following guidance to Staff, and to further consider "recommending to Council" the same:

- Eliminate all Palo Alto unique/specific Electrification requirements
- Adopt and embrace SolarAPP+ **AS IS**, don't subvert the intent of a nationwide/standard process for Electrification permitting and inspection
- Adopt electrification-supportive tradeoffs regarding PV panels, ESS batteries, setbacks, etc.

Respectfully,

Don Jackson
Palo Alto Resident
Former UAC Commissioner (6/2019-5/2021)

My (most recent) public comments to the UAC regarding permitting of electrification technologies:



DCJ-
Comm...-01.pdf

From: Don Jackson dcj@clark-communications.com 
Subject: Comments/input/feedback re "Residential Building Electrification" 9/9/2021
Date: September 8, 2021 at 3:22 PM
To: sustainability@cityofpaloalto.org
Cc: Shikada, Ed Ed.Shikada@CityofPaloAlto.org
Bcc: Scott Love rsclove@gmail.com, Eric Schulman ceschulman@gmail.com, Gennady Sheyner gsheyner@pawebweekly.com, David Coale david@evcl.com, BRET ANDERSEN bretande@pacbell.net, Bruce Hodge hodge@tenaya.com, Sandra Slater sandra@sandraslater.com, Don Jackson dcj@yaplee-jackson.com



SCAP Ad-hoc Committee Members:

Regarding the "Barriers to Electrification" listed in the [overview](#):

I believe that by far the most important is the first, "Lack of awareness".

I had no comprehension or understanding of the environmental and health impacts of methane prior to serving on the UAC.

In my experience talking with friends and neighbors, it is extremely rare for them to have any familiarity with this issue, and the need for action/change.

It is crucial that Council and the City "sound the alarm" with far more direct and specific proclamations about this issue.

Kudos to Councilmember Cormack for her recent opinion piece ["What most people don't know will hurt us"](#),

this a good start on raising awareness, but we need to do a lot more.

As mentioned by Cormack at last week's 350 SV Palo Alto Climate Team meeting, "electrification" may not be most effective word to use to describe this topic to the general public,

because that term previously referred to the build-out of electricity infrastructure in the 1900s.

Cormack suggested "Let's get the gas out", which is directionally better,

recently I found materials from [HEET](#) with the slogan "Gas is the Past!", which is a bit catchier (IMHO),

but not as specific/prescriptive, regardless, finding and consistent use of effective terminology/taglines may prove helpful.

A frequent public reaction to opinions/editorials (like Cormack's) are comments extremely critical of moving to all-electric appliances,

many of these objections cite wildly inaccurate or incorrect information.

It is crucial that these concerns are rebutted with accurate and factual information,

we need to compile and publish a detailed "FAQ" addressing these objections and concerns.

For example, I attempted to rebut Dave Price's opinion piece ["Why is the government building EV charging stations?"](#),

(completely unsuccessfully, as Price refused to publish my response),

I'm attaching my essay below, as an example of the kind and type of rebuttals that will be needed to combat "fake news" and public misperceptions regarding electrification.

Not all the objections and concerns raised are inaccurate, some are completely valid, it is imperative that we acknowledge those,

and articulate our plans and goals to ameliorate them over time.

An excellent [recent blog](#) detailed the high costs encountered by a local resident converting to a heat-pump water-heater.

CPAU's natural gas rates are lower than electrical rates, we must find a way to lower the operational (utility) cost of electric replacements for gas appliances.

The City's permit and inspection processes for electrification projects are onerous, expensive, excessive in relation to neighboring jurisdictions, and are in direct opposition, and pose a significant impediment, to our S/CAP goals. These issues are well known by the community and by contractors (many of whom refuse to work in Palo Alto), and are described reasonably well in a [recent scathing newspaper article](#). Both CPAU and the Planning/Development department are directly to blame for this state of affairs.

The UAC reviewed this topic in both April and September of this year, my current opinion is that Planning/Development is making a sincere effort to improve, but it is far from clear that they will be able to make the necessary and required changes without additional motivation/direction.

CPAU is intransigent and completely resistant to modernizing its interconnection requirements regarding PV and ESS systems, sadly, their justifications lack rationality, and they have even begun resorting to "scare tactics" in an attempt to obfuscate and deflect the issues.

The comments I submitted to the UAC regarding this agenda topic in September are attached below,

and I urge the committee to review both the Staff presentations and public comments for both the April and September UAC meetings.

Council must review these issues, and consider providing direction to Staff.

In my experience, the typical way that required residential electric service capacity levels are computed is EXTREMELY conservative (primarily because they are based on obsolete non-energy-efficient appliances, and incandescent lighting), resulting in excessive, unnecessary, and expensive panel and service upgrades to 400A, when 200A is entirely sufficient for the majority of completely electrified homes in this area. More accurate capacity planning can be accomplished by measuring actual usage over a 30-day period, the required measurement devices are commercially available today, and CPAU's planned smart-meter deployments in a few years may facilitate more accurate and reasonable electrical service planning.

After public awareness on this topic is increased, we must "ratchet up" the requirements/mandates for electrification, including:

- Banning the installation/replacement of ANY new gas appliances.
- Requiring the replacement of existing gas appliances on resale, and on most remodels

I fully appreciate that electrification of multi-family units, rental properties, and commercial buildings poses significant obstacles, and that there are important social-equity issues/concerns with even single-family-residence electrification, but we must begin the process of electrification NOW, providing exceptions/exemptions and support for those that need them, as we work to solve these additional challenges.

We must not wait until all possible concerns are solved before beginning this process.

It would be unsustainable (and undemocratic) to enact electrification mandates that are not supported by a majority of residents.

Education, awareness, supportive City building codes, Utility rate reform, and the like, will help to build public support for electrification requirements.

Given that we are starting from a base of almost ZERO all-electric residences, we have a LONG way to go.

While 80% residential electrification would be fantastic, at this moment, achieving 10% electrified residences within a few years would be amazing progress.

I suggest that we focus initially on the “low hanging fruit”, that is, residents who are receptive to voluntary electrification, and that will not require significant financial support to undertake this transition.

Regarding EVs, the City’s website states:

Our city ranks as one of the top in the nation to embrace this clean technology. EVs now account for more than 30% of new car sales in Palo Alto - the highest adoption rate in the country.

Perhaps targeting current EV owners who might be particularly receptive to the electrification message would be one good place to start.

Respectfully,

Don Jackson

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Links, References, and Attachments:
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My example/attempted-rebuttal to inaccurate electification concerns:



PriceRebuttal.pdf

My (most recent) public comments to the UAC regarding permitting of electrification technologies:



DCJ-Comm...-01.pdf

HEET dangers-of-gas & induction cooking information:

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- <https://heet.org/wp-content/uploads/2019/11/Gas-Health-Info-07.02.18.pdf>
 - <https://heet.org/wp-content/uploads/2020/08/Induction-2-pager.pdf>
 - <https://heet.org/wp-content/uploads/2020/08/Taste-the-Future-2-pager.pdf>