

November 29, 2021

Clerk of the Board
California Air Resource Board
P.O. Box 2815
Sacramento, CA 95814

SUBMITTED VIA EMAIL

Re: Small Off-Road Engine (SORE) Regulation

Dear Chair Randolph, Board Members and staff:

The Western Propane Gas Association (WPGA) appreciates the opportunity to comment on the proposed amendments to the Small Off-Road Engine (SORE) regulation. WPGA is respectfully opposed to any regulation that restricts Californian's access to affordable, clean, and reliable energy resiliency measures.

In recent years, millions of Californians have suffered due to Public Safety Power Shut Offs, rolling blackouts, and other various de-energization events. These occurrences are a prime example of why relying on a single power source is unacceptably risky and accentuate the need for both energy diversity and resiliency across the state, not only in terms of building and transportation energy, but also backup power generation. Portable generators, of all sizes, fueled with propane serve as critical life-saving power source for homes, businesses, firefighters and others during these far too frequent de-energization events.

Generators often serve a much different role than the other applications, such as lawn and garden equipment that fall under the SORE regulation. For example, lawn and garden equipment are subject to discretionary use and charging, while generators are often needed in unplanned, emergency power situations. Furthermore, many of the aforementioned de-energization events last for extended periods of time, where zero-emission (ZE) generators would require the purchase of multiple spare batteries or a solar-powered charger, significantly increasing the price to both own and operate.

In an attempt to help combat climate change, the propane industry has invested heavily in the development of renewable propane, derived from sustainable sources like beef tallow or used cooking oil. In terms of cost, renewable propane is also completely fungible with current propane-fueled technologies, allowing consumers to use renewable propane as a drop-in solution without the burden of purchasing new equipment to help reduce emissions.

In addition, there is already enough renewable propane available in the United States today to displace 10% of the fossil propane consumed in the state's propane transportation sector. WPGA is dedicated to helping California meet its decarbonization goals and has made a sustainability commitment to supply 100% renewable propane in California by 2030.

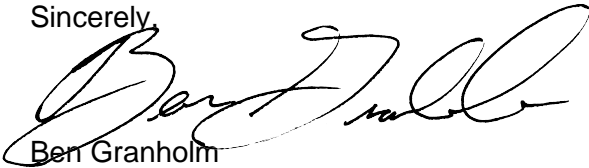
Requiring ZE portable generators would unnecessarily burden the residents of California and drastically reduce their ability to access adequate cost-effective emergency backup power. Propane generators should be embraced by this regulation with an analysis life-cycle emissions. These life cycle emissions should account for how electricity is generated and the source of new emerging fuels like renewable propane. Consideration should also be given to the fact that current ZE generators have limited peak power, making them unsuitable for operating certain household equipment. Unfortunately, ZE generators often cannot currently be used to provide backup power during a significant electric utility power outage, due to the short run time and charging requirements. In such cases propane (inclusive of renewable propane) provides energy security.

WPGA respectfully asks that CARB:

- Re-evaluate data used for this regulation that overestimates both the population of spark-ignited portable generators in California and their associated emissions;
- Perform life cycle emissions analysis on the proposed regulated equipment that includes embedded emissions associated with electricity generation;
- Ensure both technological and cost feasibility for any recommended proposal;
- Allow incentives funding for generators that utilize renewable propane.

We value our role as a partner for clean energy initiatives. California residents need the assurance that when they find themselves in an emergency situation, there will be affordable, clean energy products on the market. Generators fueled by propane and renewable propane facilitates both of these objectives. We thank you for your consideration and look forward to the opportunity of working with you to provide all Californians a clean and resilient energy future.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Granholm", written in a cursive style.

Ben Granholm
Regulatory Affairs Specialist