

William Kominers

July 26, 2022

*Via Electronic Mail*

The Honorable Gabe Albornoz  
President and Members of the Montgomery County Council  
Stella B. Werner Council Office Bldg.  
100 Maryland Avenue  
Rockville, MD 20850

Re: Bill No. 13-22

Dear President Albornoz and Members of the Council:

This letter presents my comments as an individual in opposition to Bill No. 13-22. Please place this letter in the Record of the July 26, 2022, Public Hearing on Bill No. 13-22.

Bill No. 13-22 would make Henry Ford proud. Henry Ford said the public was allowed to have any color car they wanted, so long as it was black. I would not want to have Henry Ford selecting the details of my home or business. But with Bill No. 13-22, the County seems to be paraphrasing Henry Ford by saying that: "a person or business in the County can have any kind of power source desired, so long as it is electricity (rather than any other type)." This represents an unacceptable restriction of choices to our citizens.

This blanket approach elevates opinions about one problem, and its presumed solution, over all others issues, such as energy efficiency, cost, and personal safety. I am disappointed that on matters so related to personal use and energy efficiency, the Council would presume to dictate to the public the sole method of heating, cooking, and operating homes and businesses. Yet, that is exactly what this Bill proposes to do.

To further eliminate the choices that individuals may make, the Bill ignores the dangers of reliance on a single source of power. A source whose inability to maintain and restore power supply is legendary for its failures.

The Bill raises many questions, but provides very few answers. One would expect that such far-reaching legislation, that of necessity relies upon the ability of a public utility to provide sufficient expanded service, would have explored that capability in advance and have the information incorporated into the reports on the Bill. However, that does not appear to be case. There has been no explanation or assertion that the electric power utilities have the capacity to generate, or the ability to distribute and deliver power to meet the needs of the public that will be

required by the Bill. Perhaps even more importantly, there has been no plan in the Bill to assure the public that the power source will be available without interruption. There is certainly experience in Montgomery County for occasions when electric power service has been lost for protracted periods due to storms or other damage. In those instances, there are numerous cases where restoration of power has required multiple days or a week. The Bill provides no assurance that these outages will not occur in the future. And when every operating system is electric powered, there is no alternative to be used while the utility attempts to restore service. At least today, natural gas service can power stoves, water heaters, HVAC, and emergency power to keep people safe in their homes.

As I said earlier, the Bill raises many questions for which answers should be provided before the Bill can be properly considered by the Council. Similarly, an Economic Impact Statement, as required by Bill 10–19, should be provided that shows the impact of the Bill on those who must deal with compliance and the resulting consequences.

To bring to the Council's attention the many issues that arise from this Bill, I pose for you below a series of questions that I believe should be explored and answered before any action is taken on this Bill. While I am certain that there are many more questions beyond those below, I commend these questions to you as a starting point for your analysis.

I recommend that you take no action on the Bill until these questions have been fully answered. These questions are integral to an understanding of whether the Bill can function as intended, and allow the populace to function. Therefore, I believe that after these questions are answered, and information from these questions is gathered from the many sources, such as the public utilities involved, a second public hearing should be held. That way, the public can comment on the Bill in the context of the knowledge of its implications and the facts upon which it is based, rather than just the expediency of a sound bite, as presented by the Bill today.

Questions:

1. Is there sufficient capacity on our electrical grid to handle the additional load required if buildings now powered by gas boilers require all electricity?
2. What is the projected amount of electricity that will be needed if this Bill is fully implemented, as compared to the usage today?
3. What kinds of upgrades would Pepco or BG&E need to make in order to handle the additional capacity? Who will pay for that? Will the utilities be allowed to simply pass along the costs to the ratepayers?
4. Would the County provide incentives, tax credits, or low-interest loans to help defer the heavy costs to property owners for replacement of equipment? Commercial and residential?
5. What will be the fuel source for the utility for creating all the additional electricity that will be needed? Burning natural gas? Burning coal? How does that solve the basic

problem?

6. How will this Bill prevent monopolistic treatment and pricing by the electric utilities?
7. When there is an electrical power outage, as many experience in the County, how will the County assure power is available for, often lifesaving, systems?
8. What is the expected plan to address/repair outages more quickly than they do now? This is a matter of public safety when we find ourselves with six (6) day or more outages, as have occurred.
9. Even a one day or part day outage can be life threatening due to loss of food supplies or inability to have water or sanitation (well and septic systems require water, usually via an electric pump). Likewise, sump pumps or sewer ejector devices require power. How will people be assured electric service will be sufficient and available?
10. Will this Bill exacerbate food insecurity, as power outages without backup generators with other power sources, cause food in refrigerators and freezers to spoil as electricity is not restored quickly?
11. How are emergency generators treated? Commercial? Residential? You do not want emergency generators run by gasoline, because they would require people to go out during a storm event to replenish the gasoline supply. Or have to store large quantities on site. Both can endanger people. Especially elderly. Natural gas is much safer and secure.
12. What are the relative efficiencies of electric systems rather than natural gas or oil (boilers, water heaters, stoves/cooktops)? Are we trading one cost for another?
13. How well do some of these electric heating systems work? Electric heat pumps are generally viewed to have significant challenges during cold, and especially extreme cold weather. Severe cold may not be that frequent, but it is a danger and big concern when it occurs. What alternatives are there that solve this problem so that even with operating electric service, residents can be comfortable in their homes?
14. How is the supply chain for all the new appliances that would replace gas powered water heaters, heating system boilers, stoves, clothes dryers, and other home appliances?
15. How well will residents and businesses be treated by the gas or oil companies for service or supply when the market share in this area will be so drastically reduced?
16. Are hospitals included in “life sciences”?
17. What does “major renovation” or “addition” mean? This seems very vague.

18. What is the grandfathering of existing equipment and fuel sources? For commercial? For residential?

Thank you for your consideration of these questions and my comments. I look forward to the answers to these and the many other likely questions, and to then have an opportunity to comment to you based upon that factual background.

Very truly yours,

A handwritten signature in blue ink that reads "William Kominers." The signature is written in a cursive style with a period at the end.

William Kominers