

The Florida Natural Gas Association and the Florida Propane Gas Association strongly urge the Energy TAC to reject proposed modifications, RE#38, and its companion commercial modification, CE#380, as they represent a flawed policy that would result in statutory conflicts with Florida law. The voluntary electrification readiness provisions outlined in Appendix RK (Electric-Ready Residential Building Provisions) and Appendix CH (Electric-Ready Commercial Building Provisions) have the effect of discouraging and/or eliminating the inclusion of fuel gas in building designs across Florida.

Restricting access to fuel gas poses several risks, which include its crucial role during emergencies, natural disasters, and electricity outages. Fuel gas is also essential for high-efficiency systems, such as condensing water and space heating, which can reach up to 98% efficiency. Even as a voluntary appendix, if adopted by local municipalities, these provisions would conflict with Florida's statutory protections in 366.032(1) F.S. that safeguard against banning fuel gas and/or implementing measures with similar effects.

We strongly and unequivocally recommend rejecting these proposed modifications. Our commitment to this position is steadfast.

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