

April 23, 2025

To: The Honorable Pamela Bondi, Esq.
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U.S. Department of Justice
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From: Mr. Stephen Kaminski, Esq.
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Cc : The Honorable Christopher Wright, Secretary, U.S. Department of Energy
The Honorable Lee Zeldin, Secretary, U.S. Environmental Protection Agency
Mr. Adam R.F. Gustafson, Acting Assistant Attorney, U.S. Department of Justice –
Environment and Natural Resources Division
Mr. Marcus Sacks, Assistant Director, U.S. Department of Justice, Commercial Litigation Branch
Mr. Kevin VanLandingham, Assistant Director, U.S. Department of Justice, Commercial
Litigation Branch
Mr. James Goyer, Deputy Assistant to the President and Director, White House Office of
Public Liaison
Ms. Hailey Hart Borden, Special Assistant to the President, Director of Business Outreach
Mr. Alex Flemister, Director of Strategic Initiatives, White House Office of Public Liaison

Re: Executive Order: Protecting American Energy from State Overreach

Attorney General Bondi,

On April 8, 2025, President Trump issued an incredibly important Executive Order to unleash American energy through the removal of all illegitimate impediments to the use of domestic energy resources. [Protecting American Energy From State Overreach – The White House](#)

The National Propane Gas Association (NPGA)¹ fully supports vigorous execution of this Executive Order as dozens of state and local laws and regulations are illegally decimating a vital source of American energy: Propane.

¹ NPGA is the national trade association of the propane industry with a membership of about 2,400 companies, and is affiliated with state and regional associations representing members in all 50 states. NPGA's membership includes retail marketers of propane gas that deliver the fuel to the end user, propane producers, transporters and wholesalers, and manufacturers and distributors of equipment, containers, and appliances. Propane is used in over 18 million installations nationwide (in addition to over 40 million portable "BBQ" cylinders, which account for 3% of domestic propane usage).

Propane is a domestic powerhouse—the U.S. produces close to 40 billion gallons each year (as a byproduct of natural gas processing and oil refining). Approximately 10 billion gallons are used domestically and the remainder is exported. Propane provides home heat (space and water) to millions of Americans where the natural gas grid does not reach, and is used in industrial processing, America’s agriculture sector, power generation, and as a clean-burning engine fuel in over-the-road vehicles and industrial lift trucks. Given its portability and independence of both the electric grid and natural gas grid, propane is called into action time and again in the aftermath of natural disasters, powering everything from hospitals to cell towers.

The *Protecting American Energy from State Overreach* Executive Order, among other things, directs your office—in consultation with the heads of appropriate executive departments and agencies—to identify all State and local laws, regulations, causes of action, policies, and practices (collectively, State laws) burdening the use of domestic energy resources that are or may be unconstitutional, preempted by Federal law, or otherwise unenforceable.

NPGA has compiled a list of the State Laws—with links—we believe bear consideration by the U.S. Attorney General’s office under the *Protecting American Energy from State Overreach* Executive Order.² These State Laws burden the use of propane, *e.g.*, by promoting electric power to the detriment of conventional liquid energy sources, and we believe many of these State Laws are preempted by the Energy Policy & Conservation Act of 1975 (EPCA).

For example, actions by the states of California, New York, and Washington (highlighted below) all but eliminate the use of gas for residential home heating. And states like Massachusetts, Oregon, and Vermont are financially crippling conventional energy sources to push their all-electric agenda.

The State Laws that impact the largest number of Americans who use propane as their primary source of home heating, and impact the most gallons of American-produced propane, are highlighted in grey. In addition, we have noted those State Laws that NPGA is aware are currently being challenged in court.

We would be happy to assist you in your review and/or challenge of any of the State Laws described below.

States with No State Laws NPGA Believes Warrant Review:

AL, AR, AK, FL, GA, ID, IN, KS, KY, MS, MO, NE, ND, OH, OK, SC, SD, TN, UT, WV, WY

State Laws NPGA Believes Warrant Review:

California

State Activity

- State passed [Senate Bill 32](#) to reduce GHG emissions 40% below 1990 levels by 2030.
- California set an [Executive Target](#) to reach net-zero carbon dioxide emissions by 2045.

² There are dozens, if not hundreds, of additional state and local bills and regulations that have been proposed that illegally and unfairly disadvantage conventional liquid fuels. For purposes of this letter, NPGA has only identified those that are currently in effect.

- Air Resources Board is in the process of completing its rulemaking for the [zero-emission space and water heating](#) regulation, which mandates that new space and water heaters sold in the California market must be powered by electricity.
- Air Resources Board finalized its [zero-emission forklift regulation](#), which prohibits the production and sale of large, spark-ignited (LSI) forklifts, including those powered by propane and gasoline, and requires the early retirement of LSI forklifts currently in operation.
 - NPGA provides financial support to the Western Propane Gas Association’s (our California state chapter) challenging this regulation on three major causes of action, including a violation of the state’s Environmental Quality Act (CEQA) due to unintended environmental harm, Administrative Procedures Act (APA) due to inadequate analysis on the cost impacts, and California Constitution due to the creation of a rule that usurps legislative authority. *Western Propane Gas Association v. California Air Resources Board et al.* (Fresno County Superior Court, Case No. 24CECG03716).
- [Executive Order N-79-20](#) declares that is the goal of the State that 100 percent of in-state sales of new passenger vehicles will be zero-emission by 2035.
- [Low Carbon Fuel Standard](#) (LCFS) has been in effect since 2011. Program seeks to reduce, over time, the carbon intensity of transportations fuels used in a state and transition the market to alternative vehicle fuels.
- [Cap-and-Trade](#) program has been in effect since 2013. Under Cap-and-Trade, the state sets a numeric limit on the amount of GHG emissions that may be emitted within its jurisdiction and applicable entities are required to obtain allowances for their covered emissions.
- [Advanced Clean Cars II](#) regulation requires automakers to produce and deliver for sale an increasing percentage of zero-emission vehicles each year to meet emission reduction goals and electric vehicle deployment targets.
- [Advanced Clean Trucks](#) regulation requires vehicle manufacturers who certify Class 2b-Class 8 chassis or complete vehicles to meet increasing sales requirements for zero-emission trucks.
- State provides [financial subsidies](#) for the installation of heat pumps and heat pump water heaters. These incentives promote fuel-switching away from conventional fuels.

Municipal & County Action

- Berkeley – City of Berkeley received a [presentation](#) proposing a new “Zero NOx Reach Code” from the City’s Chief Building Official, which would apply to new construction.
- Brentwood – [Resolution No. 23-018](#) enacted a permanent ban on oil and gas development and operations in the City of Brentwood.
- Los Angeles – [Ordinance No. 187714](#) mandates that all new buildings be constructed with all-electric systems, effectively prohibiting thermal fuel infrastructure.

- Morgan Hill – City adopted [Ordinance No. 2306](#) prohibiting gas infrastructure in new buildings.
- Pasadena – City enacted [Ordinance 7398](#) mandating the electrification of newly constructed commercial, multi-family residential, and mixed-use buildings.
- San Francisco – City enacted [AB-112](#), which requires that all new construction be all-electric.

Colorado

State Action

- [House Bill 19-1261](#) created statutory targets to reduce GHG emissions 26% by 2025, 50% by 2030, and 90% by 2050, all compared to 2005 levels.
- Governor enacted the [Greening Government Executive Order](#) to establish environmental and electrification goals and directives for all state agencies and departments.
- [Advanced Clean Cars II](#) regulation requires automakers to produce and deliver for sale an increasing percentage of zero-emission vehicles each year to meet emission reduction goals and electric vehicle deployment targets.
- [Advanced Clean Trucks](#) regulation requires vehicle manufacturers who certify Class 2b-Class 8 chassis or complete vehicles to meet increasing sales requirements for zero-emission trucks.
- State provides [financial incentives](#) for heat pumps and heat pump water heaters. These incentives promote fuel-switching away from conventional fuels.

Municipal & County Action

- Avon – Adopted Ordinance [No. 23-03](#), which requires electric readiness in all new construction. Additionally, the city recently adopted a net-zero building code [roadmap](#), aligning with regional goals to achieve net-zero emissions in new construction by 2030.
- Basalt – The town adopted the net-zero building code [roadmap](#).
- Crested Butte – The city passed [Ordinance No. 13](#), which requires that new residential and commercial construction be all-electric, prohibiting natural gas (or propane) for heating, water heating, and appliances.
- Denver – The City of Denver passed the “Energize Denver” [Ordinance No. 21-1310](#), which includes a prohibition on gas furnaces and water heaters.
 - NPGA is one of several plaintiffs including the National Association of Home Builders (NAHB), the National Apartment Association (NAA), the National Restaurant Association (NRA), the Colorado Association of Home Builders (CAHB), and the American Hotel and Lodging Association (AHLA) [challenging](#) Denver’s electrification ordinance under EPCA.
- Golden – The town adopted the net-zero building code [roadmap](#).

- Lafayette – The town passed [Ordinance No. 2023-07](#), requiring new residential and commercial buildings to be fully electric, eliminating the use of thermal fuels.

Connecticut

State Action

- State enacted [Senate Bill 7](#) to reduce GHG emissions 45% below 2001 levels by 2030, and 80% by 2050. Previously, the state enacted statutory targets in 2008 to reduce GHG emissions at least 10% below 1990 levels by 2020, and 80% below 2001 levels by 2050.
- State is party to the [New England Heat Pump Accelerator Program](#). Under the program, Connecticut uses funds to lower the cost for consumers to purchase and install air-source heat pumps, ground-source heat pumps, and heat pump water heaters designed to operate in colder climates.

Delaware

State Action

- Delaware set an [Executive Target](#) to reduce GHG emissions 26-28% by 2025.
- [The Climate Solutions Act](#) updated the state's emission reduction target to a 50% reduction by 2050.
- Department of Natural Resources and Environmental Control adopted [regulations](#) that require, by 2035, in-state sales of light- and medium-duty vehicles to represent 82% of vehicle sales.

District of Columbia

- D.C. Council passed the "[Clean Energy DC Building Code Amendment Act](#)," which mandates that all new construction and substantial renovations of covered buildings comply with net-zero standards, and bans on-site fuel combustion.

Hawaii

State Action

- Hawaii passed [Act 238](#) requiring the state to achieve carbon neutrality by 2045.

Illinois

State Action

- State set an [Executive Target](#) to reduce GHG emissions 26-28% below 2005 levels by 2025.
- [Public Act 102-0662](#) updated the state's emission reduction targets to 50% below 2005 levels by 2030.

Municipal & County Action

- Evanston – The municipality adopted the Illinois Stretch Energy Code, 20 ILCS 3125/55, which requires zero normalized onsite and district thermal greenhouse gas emissions, and 100 percent of electricity usage sourced through renewable electricity, as detailed in [Ordinance 1-O-25](#).
- Oak Park – The municipality passed [Ordinance 23-47](#) and [Ordinance 23-53](#) that ban gas infrastructure in new buildings, requires all-electric new construction, and bans gas hookups for commercial and residential buildings.

Iowa

Municipal & County Action

- Ames – The municipality formally adopted a [Climate Action Plan](#) which includes the following language: “All buildings, whether new or existing, will switch from fossil fuels to electricity for space heating, space cooling, and water heating.”

Louisiana

State Action

- State set an [Executive Target](#) to reduce net GHG emissions 26-28% by 2025 and 40–50% by 2030, compared to 2005 levels. The targets also aim for net-zero GHG emissions by 2050.

Maine

State Action

- Maine set an [Executive Target](#) to achieve net-zero GHG emissions by 2050.
- [Legislative Document 1679](#) requires the state to reduce GHG emissions 45% below 1990 levels by 2030, and 80% below 1990 levels by 2050.
- State is party to the [New England Heat Pump Accelerator Program](#). Under the program, Maine uses funds to lower the cost for consumers to purchase and install air-source heat pumps, ground-source heat pumps, and heat pump water heaters designed to operate in colder climates.
- [Efficiency Maine](#) is a state program that provides financial subsidies for the purchase and installation of heat pumps and heat pump water heaters in residential homes and commercial buildings. These incentives promote fuel-switching away from conventional fuels.

Maryland

State Action

- [Senate Bill 528](#) requires the state to reduce GHG emissions 60% below 2006 levels by 2031.
- [Climate Solutions Now Act](#) requires large buildings to have net-zero direct emissions, and requires the state fleet and local school buses to be zero-emission vehicles.
- [Executive Order](#) that prohibits the sale of non-electric passenger vehicles by model year 2035.

- Department of the Environment is creating the [zero-emission heating equipment standard](#), which creates the equivalent of an all-electric installation mandate for thermal equipment in buildings.
- Department of the Environment is developing a [Clean Heat Standard](#) to reduce GHG emissions from thermal applications. The program would financially penalize the use of conventional thermal fuels.
- [Advanced Clean Cars II](#) regulation requires automakers to produce and deliver for sale an increasing percentage of zero-emission vehicles each year to meet emission reduction goals and electric vehicle deployment targets.
- [Advanced Clean Trucks](#) regulation requires vehicle manufacturers who certify Class 2b-Class 8 chassis or complete vehicles to meet increasing sales requirements for zero-emission trucks.
- State provides [financial incentives](#) for the purchase of solar water heating systems, solar PV systems, and geothermal heat pumps. These incentives promote fuel-switching away from conventional fuels.

Municipal & County Action

- Howard County – The county passed Bill [CB5-2023](#), which transitions buildings to all-electric structures.
- Montgomery County – The county passed Bill [13-22](#), which requires new construction to be all-electric, with few exceptions.

Massachusetts

State Action

- [The Creating A Next-Generation Roadmap for Massachusetts Climate Policy Act](#) to reduce GHG emissions 85% below 1990 levels by 2050, with the goal of achieving net-zero emissions by 2050 and an interim target of reducing emissions at least 75% below 1990 levels by 2040.
- State [set](#) interim targets to reduce GHG emissions 33% by 2025 and 50% by 2030 from 1990 levels.
- [310 Code of Massachusetts Regulations](#) requires obligated businesses to report their verified statewide greenhouse gas emissions.
- Department of Energy Resources' Municipal Fossil Fuel Free Building Demonstration Program ([Session Law, Chapter 179, Section 84 2022](#)) enables cities and towns to adopt and amend general or zoning ordinances or by-laws to require new building construction or major renovation projects to be fossil fuel-free.
- [225 CMR 22.00](#): Massachusetts' stretch code for low-rise residential buildings implements a stretch energy code that is more restrictive for mixed fuel buildings than all-electric ones, making it cost prohibitive to install gas appliances and equipment.
- [Session Law, Chapter 179, Section 81, 2022](#) prohibits the sale of non-zero-emission light-duty vehicles by December 31, 2035.

- Department of Environmental Protection is designing a [Clean Heat Standard](#) to reduce GHG emissions from thermal applications. The program would financially penalize the use of conventional thermal fuels.
- State is party to the [New England Heat Pump Accelerator Program](#). Under the program, Massachusetts uses funds to lower the cost for consumers to purchase and install air-source heat pumps, ground-source heat pumps, and heat pump water heaters designed to operate in colder climates.
- [Advanced Clean Cars II](#) regulation requires automakers to produce and deliver for sale an increasing percentage of zero-emission vehicles each year to meet emission reduction goals and electric vehicle deployment targets.
- [Advanced Clean Trucks](#) regulation requires vehicle manufacturers who certify Class 2b-Class 8 chassis or complete vehicles to meet increasing sales requirements for zero-emission trucks.

Municipal & County Action

- Brookline – Municipality enacted the Fossil Free [Bylaw](#) that bans fossil fuels in new construction.
- Cambridge – Fossil Fuel Free [Ordinance](#) requires new buildings and major renovations to be fossil fuel-free.
- Lexington – [Fossil Fuel Bylaw](#) bans the installation of piping for natural gas, propane, and other fossil fuels in new buildings.
- Newton – Newton passed an electrification [Ordinance](#) requiring new construction and major renovations to be fossil fuel-free, aligning with the state’s demonstration program.
- Northampton – City Council approved an [Ordinance](#) banning the use of fossil fuels in new buildings and renovations.

Michigan

State Action

- Governor set an [Executive Target](#) to achieve economy-wide carbon neutrality by 2050 and to maintain net-negative GHG emissions thereafter. The targets also include interim goals to reduce GHG emissions 28% by 2025 and 52% by 2030, from 2005 levels.
- [Senate Bill 271](#) set a clean energy standard that requires electric providers to achieve a clean energy portfolio of at least 80% from 2035-2039, and 100% by 2040 and each year thereafter.

Municipal & County Action

- Ann Arbor – Municipality passed a resolution in support of a gas ban [Ordinance](#).

Minnesota

State Action

- [House Fil 436](#) enacted statutory targets to reduce GHG emissions 30% below 2005 levels by 2025, and 80% below 2005 levels by 2050.
- [2024 Statutes, 473.3927](#) requires the Metropolitan Council to develop and maintain a zero-emission and electric vehicle transition plan.
- [2024 Statutes, 216C.374](#) established an electric school bus deployment program that provides grants to accelerate the deployment of electric school buses.
- [2024 Statues, 216C.45](#) created a residential electric panel upgrade grant program to provide financial subsidies for home electrification efforts.

Montana

State Action

- State established a [target](#) to reach economy-wide GHG neutrality between 2045–2050.

Nevada

State Action

- [Senate Bill 254](#) set a target to reduce GHG emissions 28% by 2025 and 45% by 2030, compared to 2005 levels, and reach zero or near-zero emissions by 2050.

New Hampshire

State Action

- State is party to the [New England Heat Pump Accelerator Program](#). Under the program, New Hampshire uses funds to lower the cost for consumers to purchase and install air-source heat pumps, ground-source heat pumps, and heat pump water heaters designed to operate in colder climates.

New Jersey

State Action

- State passed [An Act Concerning the Reduction of Greenhouse Gases](#) to reduce GHG emissions to 1990 levels by 2020, and 80% below 2006 levels by 2050.
- Governor issued an [Executive Order](#) to reduce emissions 50% below 2006 levels by 2030.
- Governor issued an [Executive Order](#) to electrify (new construction and retrofits) 400,000 dwellings and 20,000 commercial properties by 2031.
- [Advanced Clean Cars II](#) regulation requires automakers to produce and deliver for sale an increasing percentage of zero-emission vehicles each year to meet emission reduction goals and electric vehicle deployment targets.

- [Advanced Clean Trucks](#) regulation requires vehicle manufacturers who certify Class 2b-Class 8 chassis or complete vehicles to meet increasing sales requirements for zero-emission trucks.

Municipal & County Action

- Morris Township – Municipality adopted [Ordinance No. 08-22](#), which requires that all new residential and commercial developments of apartments or apartment style housing of twelve units or greater to be all-electric buildings.

New Mexico

State Action

- New Mexico set an [Executive Target](#) to reduce GHG emissions 45% below 2005 levels by 2030.
- [Senate Bill 489](#) requires electric power producers to supply zero-carbon electricity by 2045.
- State enacted a [Clean Fuel Transportation Standard](#). Under the program, the state will design a clean fuel standard to reduce the carbon intensity of transportation fuels by at least 20% by 2030, and at least 30% by 2040, from 2018 baseline levels.
- [Advanced Clean Cars II](#) regulation requires automakers to produce and deliver for sale an increasing percentage of zero-emission vehicles each year to meet emission reduction goals and electric vehicle deployment targets.
- [Advanced Clean Trucks](#) regulation requires vehicle manufacturers who certify Class 2b-Class 8 chassis or complete vehicles to meet increasing sales requirements for zero-emission trucks.
- State provides [financial incentives](#) for the purchase of heat pumps. These incentives promote fuel-switching away from conventional fuels.

New York

State Action

- New York passed [S.65599](#) to reduce GHG emissions 40% below 1990 levels by 2030, and at least 85% below 1990 levels by 2050. The targets also aim for net-zero GHG emissions by 2050.
- [State Law, Chapter 423, Laws of 2021](#) requires that all new light-duty vehicle sales by zero-emission vehicles by 2035.
- [Section 3638, Chapter 16, Title 5, Article 73 \(Education\)](#) of state code mandates that, by July 1, 2027, school district may on purchase or lease zero-emission school buses when purchasing or leasing new buses.
- [Section 19-0306-B, Chapter 43-B, article 19, Title 3](#) states that, by 2035, all new off-road vehicle purchases must be zero-emission.
- State's [new construction building code](#) prohibits the installation of fossil fuel appliances and equipment in most newly constructed buildings beginning in 2026 for structures less than seven

stories in height, and 2029 for all remaining applicable building stock. This code largely eliminates all forms of gas for residential home heating across the entire state.

- A coalition including NPGA, multiple unions, and builder related groups [filed suit in federal district court](#) arguing that the federal Energy Policy and Conservation Act (EPCA) preempts New York state's actions.
- State is currently designing a [Cap-and-Invest](#) program that sets an annual cap on the amount of GHG emissions that may be emitted by covered entities across the state. Program will be economy-wide in its application.
- [Climate Superfund Act](#) allows the state to impose financial penalties on energy companies, including those that produce, refine, and sell fuels, because of the GHG emissions associated with the production and use of their products.
- [Advanced Clean Cars II](#) regulation requires automakers to produce and deliver for sale an increasing percentage of zero-emission vehicles each year to meet emission reduction goals and electric vehicle deployment targets.
- [Advanced Clean Trucks](#) regulation requires vehicle manufacturers who certify Class 2b-Class 8 chassis or complete vehicles to meet increasing sales requirements for zero-emission trucks.
- State provides [financial incentives](#) for the purchase of heat pumps and heat pump water heaters. These incentives promote fuel-switching away from conventional fuels.

Municipal & County Action

- Beacon – The City of Beacon enacted [Local Law No. 1](#) requiring all new residential and commercial buildings to be fully electric.
- New York City – The City passed [Local Law 154](#), which prohibits the use of fossil fuels in new buildings under seven stories starting in 2024, and in taller buildings beginning in 2027.

North Carolina

State Action

- State set an [Executive Target](#) to reduce GHG emissions 50% below 2005 levels by 2030, and to reach net-zero GHG emissions as soon as possible but no later than 2050.
- [House Bill 951](#) requires the public utilities commission to take all reasonable steps to achieve 70% reductions in carbon emission by 2030, and carbon neutrality by 2050.

Oregon

State Action

- [Executive Target](#) to reduce GHG emissions 45% below 1990 levels by 2035 and 80% below 1990 levels by 2050.

- [House Bill 2021](#) requires power producers to deliver 100% zero-emission electricity by 2040.
- [Clean Fuels Program](#) has been in effect since 2016. Program is designed to reduce GHG emissions from the transportation sector 10% below 2010 levels by 2025, 20% by 2040, and 37% by 2035.
- [Climate Protection Program](#) establishes a declining cap on GHG emissions from fossil fuels used throughout Oregon. The program is designed to reduce these emissions 50% by 2035 and 90% by 2050. This program will have a chilling effect on any supplier of fossil products in the state as there is no permissible allowance auction market.
- [Advanced Clean Cars II](#) regulation requires automakers to produce and deliver for sale an increasing percentage of zero-emission vehicles each year to meet emission reduction goals and electric vehicle deployment targets.
- [Advanced Clean Trucks](#) regulation requires vehicle manufacturers who certify Class 2b-Class 8 chassis or complete vehicles to meet increasing sales requirements for zero-emission trucks.
- State provides [financial incentives](#) for the purchase of heat pumps. These incentives promote fuel-switching away from conventional fuels.

Municipal & County Action

- [Ashland](#) – Municipality imposed a fee on new gas hookups. This [Ordinance](#) requires new residential homes that choose to install gas appliances to pay a fee based on the carbon emissions of each appliance.

Pennsylvania

State Action

- Governor issued an [Executive Order](#) to reduce GHG emissions 26% below 2005 levels by 2025, and 80% below 2005 levels by 2050.
- State provides [rebates](#) for commercial kitchens to purchase electric cooking equipment, such as stoves and ovens. These incentives promote fuel-switching away from conventional fuels for cooking applications.

Rhode Island

State Action

- State passed the [Act on Climate](#) to reduce GHG emissions 10% by 2020, 45% by 2035, and 80% by 2040, all compared to 1990 levels. The targets also aim for net-zero GHG emissions by 2050.
- [H 7277](#) sets a goal to achieve 100% of electricity demand is met from renewable energy resource by 2033.
- State is party to the [New England Heat Pump Accelerator Program](#). Under the program, Rhode Island uses funds to lower the cost for consumers to purchase and install air-source heat pumps, ground-source heat pumps, and heat pump water heaters designed to operate in colder climates.

- [Advanced Clean Trucks](#) regulation requires vehicle manufacturers who certify Class 2b-Class 8 chassis or complete vehicles to meet increasing sales requirements for zero-emission trucks.

Texas

Municipal & County Action

- Austin – [Ordinance 35-0605](#) repeals and replaces Article 12 of the City of Austin’s Technical Codes to adopt the 2024 International Energy Conservation Code (IECC), including several local amendments. These amendments include mandating new buildings to include electrical infrastructure to allow for future gas-to-electric conversions.

Vermont

State Action

- Vermont passed [H.688](#) to reduce GHG emissions 26% below 2005 emissions by 2025, 40% below 1990 levels by 2030, and 80% below 1990 levels by 2050.
- [H 289](#) requires all electric utilities to provide 100% renewable energy by 2035.
- Final authorization and implementation of the [Clean Heat Standard](#), which would financially penalize the use of conventional thermal fuels.
- [Climate Superfund Act](#) allows the state to impose financial penalties on energy companies, including those that produce, refine, and sell fuels because of the GHG emissions associated with the production and use of their products.
- [Advanced Clean Cars II](#) regulation requires automakers to produce and deliver for sale an increasing percentage of zero-emission vehicles each year to meet emission reduction goals and electric vehicle deployment targets.
- [Advanced Clean Trucks](#) regulation requires vehicle manufacturers who certify Class 2b-Class 8 chassis or complete vehicles to meet increasing sales requirements for zero-emission trucks.
- State provides [financial incentives](#) for the purchase of heat pumps and heat pump water heaters. These incentives promote fuel-switching away from conventional fuels.

Virginia

State Action

- State enacted the [Virginia Clean Economy Act](#) to achieve net-zero GHG emissions across all sectors by 2045.

Washington

State Action

- Washington passed [House Bill 2311](#) to reduce GHG emissions 45% by 2030, 70% by 2040, and 95% by 2050, all compared to 1990 levels. The targets also aim for net-zero GHG emissions by 2050.

- [Senate Bill 5116](#) requires all utilities to delivered 100% renewable electricity by 2045.
- State's [new building codes](#) make it significantly more expensive to build with gas because of the implementation of an energy efficiency scoring system that heavily favors the installation of electric equipment.
 - The codes are the subject of multiple state and federal [lawsuits](#) challenging their legality under EPCA which NPGA has been a part of, including most recently joining a coalition to support an intervenor brief to defend [I-2066](#), the ballot initiative passed by Washington State voters to establish energy choice in Washington.
- [Cap-and-Invest](#) program has been in effect since 2023. Under the program, the state sets a limit on aggregate carbon emissions and requires obligated entities to obtain allowances equal to their covered GHG emissions, however available allowances decrease every compliance period.
- [Clean Fuel Standard](#) has been in effect since 2023. The standard requires fuel suppliers to reduce the carbon intensity of the transportation fuels they provide over a set schedule.
- [Advanced Clean Cars II](#) regulation requires automakers to produce and deliver for sale an increasing percentage of zero-emission vehicles each year to meet emission reduction goals and electric vehicle deployment targets.
- [Advanced Clean Trucks](#) regulation requires vehicle manufacturers who certify Class 2b-Class 8 chassis or complete vehicles to meet increasing sales requirements for zero-emission trucks.
- State provides [financial incentives](#) the purchase of a heat pump. These incentives promote fuel-switching away from conventional fuels.

Municipal & County Action

- Seattle – City Council passed an [Ordinance](#) prohibiting the use of natural gas for space and water heating in new commercial and large multifamily buildings, and also requires electric-readiness in new buildings.
- Shoreline – City Council approved [Ordinance 968](#), which amended the city's building code and requires electric space and water heating in new residential construction.

Wisconsin

State Action

- Governor issued an [Executive Target](#) to reduce GHG levels by 26-28% below 2005 levels by 2025.