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Uniform Treatment of Fugitive Emissions

Thank you for addressing the challenge of decarbonizing buildings! In the presentations at the workshop there was some thorough addressing of refrigerant related global warming through a method that could also be applied to the leakage of methane from well through processing and transport, and at meters and even in un-combusted gas at the furnace, water heater and stove burners. I recommend making reasonable estimates of leakages and applicable GWPs for both refrigerants and methane in order to produce a proper comparison. Additional emissions that can be reasonably included in the comparison are upstream emissions to produce delivered methane and delivered refrigerants. For methane these upstream emissions include % flared, % burned in processing, % burned in turbines for initial compression and transmission recompression along the route as well as the utility gas burned to power electrical compressors if they are used to transport the methane. Care should be used to associate additional low pressure leakages for gas delivered to buildings compared to gas taken off the system earlier at high pressure stages for generator fuel. (That is building gas is subject to additional leaks compared to utility scale electric generation gas. Also important to consider are the rising RPS policies and the associated low percentage of methane generation in RPS portfolios and even lower in cleaner CCA portfolios.

Thank you for considering these suggestions for fair comparisons of total emissions in gas devices and in electric devices.
-Tom Kabat