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Comment Letter for 2019-BSTD-04 "The CEC should follow CARB and use a 20 Year Methane GHG for Code, 100 Years for Reporting"

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Mon 3/30/2020 2:51 PM

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Honorable Commissioners and Staff,

During the Staff Workshop on 2022 Energy Code Compliance Metrics on Thursday, March 26th, a misunderstanding was communicated by Staff as to why the CEC has refused to comply with public criticism of using a 100 year horizon for methane leakage when the real-world impact is felt over a 20 year horizon. Staff explained that the CEC is following the leadership of the California Air Resources Board.

Aanchal Kohli, an Air Resources Engineer in the Research Division of the California Air Resources Board clarified this misunderstanding as follows:

"We do use 20-year GWP values in evaluating Short Lived Climate Pollution measures for HFCs, black carbon *and methane* [emphasis added]. CARB's SLCP strategy exclusively relies on 20-year GWP values for determining the most effective strategies to reduce SLCPs (https://ww2.arb.ca.gov/sites/default/files/2018-12/final_slcp_reduction_strategy_tL_RRX_march2017%20Final%202017.Qdf). We switch to 100-year GWP values for accounting and consistency, since California's GHG inventory uses only 100-year GWP values." -Aanchal Kohli, Research Division, California Air Resources Board. March 26th, 2020 email.

Please follow the actual leadership of CARB and use a 20 year GWP when evaluating methane leakage. Methane persists in the atmosphere for 9-13 years, performing 34 times the climate damage of CO2. Methane leakage is the cause of approximately 40% of the climate change we'll experience in the next 20 years, like a magnifying glass on California during our heat wave summers and wildfire seasons.

Sincerely,
Sean Armstrong

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Grand Prize Winner of the United Nations World Habitat Awards-2017

Grand Prize Winner of the International PCBC Gold Nugget Awards-2016

Winner of the Sustainability Award of the Building Industry Association of Southern California-2017

Winner of the Department of Energy Innovation Award-2015

Awards of Merit from the International PCBC Gold Nugget Awards-2016, 2017, 2018 and 2019