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Sierra Club California Comments on Final 2022 TDV Metrics Report

Additional submitted attachment is included below.



June 17, 2020

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Docket 19-BSTD-03
Submitted via electronic comment system

RE: Comments of Sierra Club California on Final 2022 TDV Metrics Report

Dear Commissioners:

Sierra Club California would like to commend the California Energy Commission (“Commission”) on using a 20-year Global Warming Potential (“GWP”) for analyzing methane leakage in its Time Dependent Valuation (TDV) report.

California is increasingly making use of GWP in policy directives, guidelines, and energy codes to fulfill its objective of reducing short lived climate pollutants (“SLCP”). It is important to use the 20 year GWP when evaluating the impacts and reductions of SLCP emissions since the atmospheric lifetime of SLCPs is significantly shorter than CO₂. For example, Methane leakage has 86 times the GWP of CO₂ over a 20 year period, which means that these emissions have an immediate negative impact on our climate.

We are happy to see that the Commission included a 20 year GWP in developing the TDVs for the 2022 code cycle. We believe that using a 20-year GWP for evaluating methane leakage and other SLCPs is more appropriate and properly reflects the urgency of reducing SLCP emissions in the near-term. By using the 20 year GWP, the Commission will have a better perspective on the impacts of SLCP emissions when considering policy actions for decarbonization.

Sincerely,

Lauren Cillum
Policy Advocate