

## DOCKETED

<b>Docket Number:</b>	15-IEPR-04
<b>Project Title:</b>	AB1257 Natural Gas Act Report
<b>TN #:</b>	203422
<b>Document Title:</b>	Christa Heavey Comments: NRDC and EDF Joint Comments on California Energy Commission's AB1257 Natural Gas Act Report
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Christa Heavey
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	12/9/2014 9:30:16 AM
<b>Docketed Date:</b>	12/9/2014

*Comment Received From: Christa Heavey*

*Submitted On: 12/9/2014*

*Docket Number: 15-IEPR-04*

**NRDC and EDF Joint Comments on California Energy Commission's AB1257  
Natural Gas Act Report**

*Additional submitted attachment is included below.*

# NRDC and EDF Joint Comments on California Energy Commission's AB1257 Natural Gas Act Report

**Docket No. 15-IEPR-04**

December 5, 2014

**Submitted by:**

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Natural Resources Defense Council

Timothy O'Connor, Amanda Johnson  
Environmental Defense Fund

On behalf of the Natural Resources Defense Council (NRDC) and the Environmental Defense Fund (EDF), we respectfully submit these comments on the California Energy Commission's (the Commission) AB1257 Natural Gas Act Report, per the CEC workshop held on November 18, 2014.

NRDC and EDF appreciate the opportunity to comment as the Commission works on the first AB1257 Natural Gas Report. Because we presently rely on natural gas as a fuel source, and the state is committed to reducing its carbon emissions over the long term, it is critical to understand all the environmental impacts of natural gas. **The AB1257 report should discuss in depth the environmental impacts of natural gas and ensure these impacts play a role in determining California's natural gas policies. In addressing methane leakage, we recommend that the Commission continue its collaboration with the California Air Resources Board (ARB).**

While natural gas can burn cleaner than other fossil fuels and is one way to support increased use of renewable energy sources (though there are many cleaner ways to accomplish that integration), natural gas has its own environmental impacts that must be understood and used to influence policy. Methane, the primary component of natural gas and a potent greenhouse gas, can be released through the leakage of unburned natural gas throughout the supply chain. If this methane leakage is sufficiently high, it can outweigh the claimed climate benefits of natural gas compared with other fossil fuels. In order to ensure that the use of natural gas does not undermine California's progress in meeting its greenhouse gas reduction goals, the Commission must address methane leakage and estimated leakage rates in the AB1257 Natural Gas Report.

As described in AB1257, the Commission should consult the ARB and peer-reviewed scientific analysis when evaluating the environmental impacts and lifecycle greenhouse gas emissions of natural gas. Inclusion of leakage and other environmental impacts in the AB1257 report is essential to informing natural gas policy, and this information must be consistent among state agencies. NRDC and EDF support the coordination between the Commission and ARB. We encourage the agencies to continue their dialogue and work on leakage rates and impacts, and include these findings in the AB1257 report.

NRDC and EDF appreciate the work done by the Commission to produce the AB1257 Natural Gas Act Report and support the continued coordination between the Commission and ARB. NRDC and EDF thank the Commission for its commitment to developing a thorough report that will address the environmental impacts of natural gas, to ensure the use of natural gas does not undermine California's climate goals. Thank you for consideration of NRDC and EDF's comments.

Respectfully submitted,

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