

UNITED STATES CLIMATE ALLIANCE

The Honorable Michael S. Regan, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20004

February 13, 2023

Docket ID No. EPA-HQ-OAR-2021-0317

Dear Administrator Regan,

I write on behalf of the U.S. Climate Alliance (Alliance), a bipartisan coalition of governors committed to climate action that together represent about 60 percent of the U.S. economy and 55 percent of the U.S. population. As states and territories with substantial experience advancing policies that reduce greenhouse gas emissions, we applaud the U.S. Environmental Protection Agency's (EPA) supplemental proposed rulemaking to expand and strengthen regulations to tackle methane emissions from venting, leaking, and flaring. The Alliance supports finalization of the rule and looks forward to partnering closely in its implementation to deliver critical methane reductions and public health protections across the country.

We specifically applaud the inclusion and utilization of updated estimated values for the social cost of greenhouse gases (SC-GHG) in the proposal's accompanying draft report, *The Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances*. Properly accounting for the societal costs of a changing climate is key to crafting effective state and federal policies and achieving our shared net-zero climate goals. EPA's updated approach is particularly timely as we continue to await action from the Interagency Working Group on the Social Cost of Greenhouse Gases (IWG), reestablished by President Biden in January 2021, whose current interim estimates — based on work conducted between 2010 and 2016 — are outdated and substantially underestimate climate costs.

Alliance members know firsthand that use of the SC-GHG provides a strong foundation for decision-makers to assess the benefits of GHG reductions by accounting for the true cost of climate change damages. We have collectively committed to considering the societal and environmental impacts of GHG emissions in our efforts and already, 17 Alliance states have incorporated the SC-GHG in their policymaking, including in electric power sector planning and resource compensation. Importantly, our work at the state level is informed by guidance from the IWG as well as the academic and scientific communities.

We support EPA's updated estimates for the SC-GHG in this draft report. These estimates are informed by the latest science, account for global damage estimates, and include an appropriate range of discount rates. We look forward to the forthcoming final guidance from the IWG and ask EPA, as a member of the IWG, to ensure the final revised estimates are at least as strong as those reflected in this draft report. We also look forward to continued collaboration with the Administration to further refine the SC-GHG estimates as more data becomes available on the true cost of climate change.

Thank you again for the opportunity to comment and for the Administration's ongoing partnership with states to confront the climate crisis.

Sincerely,



Casey Katims
Executive Director, U.S. Climate Alliance