

TO: The Joint – Senate Standing Committee on Finance

FROM: Tristan R. Brown, J.D., Ph.D.

DATE: January 19, 2023

RE: Scientist Sign-On Letter

Please find below a letter from members of the scientific community regarding important next steps for the implementation of the Climate Action Council Final Scoping Plan.

Regards,

Tristan

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The Honorable Kathy Hochul
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

January 9, 2023

Dear Governor Hochul,

We appreciate your leadership in the fight to stop climate change. Under your administration, New York has emerged as a global leader that is taking aggressive, proactive action to transition to a clean energy future. Just as important, you are clearly committed to ensuring a transition that is just and equitable.

The Inflation Reduction Act (IRA) provides an incredible opportunity for New York to advance our clean energy goals. By making billions of dollars available to support renewable energy projects, this groundbreaking legislation opens the door to unprecedented, large-scale green development that will help us meet the threat of climate change while growing our economy and creating good paying jobs.

Unfortunately, New York is at risk of missing out on this opportunity because the greenhouse gas (GHG) accounting system we currently use is fundamentally incompatible with the IRA. The IRA, as well as the U.S. Environmental Protection Agency, the California Air Resources Board, the Oregon Department of Environmental Quality, and the Washington Department of Ecology, use the **GREET** ([Greenhouse gases, Regulated Emissions, and Energy use in Technologies](#)) model for GHG accounting purposes. This model was developed by the U.S. Department of Energy's [Argonne National Laboratory](#) to allow analysts to evaluate the full lifecycle GHG emissions of vehicle and fuel systems. The IRA specifically requires entities seeking federal support to use the GREET model to calculate lifecycle GHG emissions.

The mismatch between the GHG emissions accounting methods used in New York's Climate Leadership and Community Protection Act (CLCPA) and the IRA is a major problem that could hamper New York's efforts to combat climate change, restrict access to federal funds and hurt New York's economy. By forcing projects producing low-carbon fuels, such as green hydrogen and sustainable aviation fuel, to provide two or more completely different accountings of their GHG emissions to the state and federal government, New York is imposing additional burdens and costs on developers that want to develop large-scale green energy projects in New York. This incentivizes businesses to relocate their projects out of New York to locations where state and federal standards are aligned.

Fortunately, it does not need to be this way. New York's GHG accounting model can be aligned with the IRA's requirements and international scientific norms. This is not only good science; it is also good for New York. By aligning the state's standards with the federal GREET GHG accounting model, New York can support the large-scale green energy projects it needs to meet its climate goals while fostering job creation and economic growth, and achieving an equitable transition to a green economy.

The undersigned scientists, who work in the field of GHG accounting, recommend that New York's GHG accounting model be brought into alignment with the GREET model required by the IRA.

We applaud your commitment to addressing the threat of climate change and dedication to supporting an equitable clean energy transition. To ensure New York remains a leader in the clean energy transition, it is critical that the state's climate requirements are aligned with federal incentives to take full advantage of the opportunities the IRA makes available.

Signed,

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cc: The Honorable Jennifer Granholm

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Director of State Operations
New York State Executive Chamber

The Honorable John O'Leary
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New York State Executive Chamber

The Honorable Sean Ewart
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