INDEPENDENT INTERVENOR EXHIBIT 6

MISPLACED PRIORITIES

This exhibit describes why the Independent Intervenors believe that CLCPA includes priorities that detract from a pragmatic decarbonization plan. The demonization of natural gas by the Climate Action Council (CAC) that was responsible for the Scoping Plan outline of implementation strategies precludes what we believe is part of the best decarbonization approach.

The CAC relied too much on academic research by member Professor Robert Howarth's work with Professor Jacobsen of Stanford. At the meeting where the Climate Action Council voted to approve the Scoping Plan, Professor Howarth justified his support of the Scoping Plan draft in a statement[1] that claims that acknowledges the "incredible role" that Jacobsen played in moving the entire world towards a carbon-free future, claimed that no new technology would be needed[2] and that the recent atmospheric methane rise was due to natural gas fracking and extraction. Independent Intervenor Exhibit 5 describes the acknowledged need for a new technology called dispatchable emissions-free resources that every New York entity that has reliability responsibilities agrees is needed. This exhibit explains why methane or natural gas is not the problem claimed by Howarth.

The claim that the recent atmospheric methane rise was due to natural gas fracking and extraction work has since been disproven[3]. Note that Howarth's work and misstatements were called out on in this reference on page 11 of 25:

[1] https://climate.ny.gov/-/media/project/climate/files/Robert-Howarth.pdf
[2] https://pragmaticenvironmentalistofnewyork.blog/2023/01/03/the-pied-piper-has-no-clothes/
[3] https://agupubs.onlinelibrary.wiley.com/doi/10.1029/2021GB007000

> This is in disagreement with Howarth (2019) who used a more depleted $\delta^{13}C$--CH4 signature for shale gas to support the hypothesis that the increase in U.S. FF emissions is the dominant contributor to the post-2006 global CH4 increase. Given the shift toward more shale gas production relative to conventional gas, the U.S. ONG signature (as a production-weighted mean of shale and conventional gas production) increased by 2.7% from 2006 to 2016.

It has now been determined[4] that the rise in atmospheric methane is being driven by microbial sources. That was determined by analyzing the ratio of carbon isotopes in the atmospheric methane. Fossil fuel based methane has higher levels of Carbon-13 (C-13) whereas microbial methane from ponds and other sources of biological decay are rich in Carbon-14 (C-14) . The samples of atmospheric methane that have been analyzed have high levels of C-14 but have depleted levels of C-13 indicating that the methane is not a result of fossil fuel extraction.

Viewed through a pragmatic lens, the New York obsession with eliminating natural gas is irrational. Increased use of natural gas has been responsible for most electric generation emission reductions observed in the state. Natural gas provides efficient, resilient, and safe energy to homes and businesses. Not so long ago the idea that natural gas could also be used a bridge fuel until the aspirational "green" generating resources and energy storage technologies could be tested at the scale needed, perform like a natural gas fired generating unit, and provide power at a similar cost, was generally accepted as a rational approach. That this vilification of methane is based on mis-understanding[5] of chemistry and radiations physics is particularly troubling.

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[4] https://doi.org/10.5194/acp-2021-622

[5] https://reformingtheenergyvisioninconvenienttruths.com/new-yorks-reforming-the-energy-vision-background-material/irrational-methane-obsession-page/