From: Wilson, Erika

Sent: Friday, December 19, 2014 3:41 PM

To: mklemun@mit.edu

Cc: Bremer, Kristen; Hackel, Angela; Risley, David

Subject: Web comment on the Clean Power Plan

Hello Mrs. Klemun

Thank you for your inquiry. In response to the question you submitted to the Clean Power Plan web site regarding methane emissions:

Yes, that is correct. Those CO2 emissions reflect the amount of CO2 emitted from the stack at power plants. However, Appendix 3A of the RIA does contain analysis and discussion of potential upstream methane emission changes in Natural Gas Systems: <http://www2.epa.gov/sites/production/files/2014-06/documents/20140602ria-clean-power-plan.pdf>.

Thank you for your interest in the Clean Power Plan.

Erika Wilson

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Submitted on 10/28/2014 9:09AM

Submitted values are:

Name: Magdalena Klemun

Email: mklemun@mit.edu

Comments:

Dear Madam or Sir,

I am a researcher working in the field of energy policy analysis at MIT's Engineering Systems Division (Trancik Lab). We are planning to submit a comment on the Clean Power Plan, and during the course of analysis an important question regarding methane emissions came up.

The projected power sector carbon dioxide emissions in the Regulatory Impact Analysis document for 2020, 2025 and 2030 are given in CO2, not CO2 equivalent (Table ES-2). Is it safe to conclude that the carbon dioxide equivalent of upstream methane emissions has not been added to these numbers?

I am aware of EPA's projection that overall upstream methane emissions in a compliance scenario are likely to be reduced, however I wasn't sure if they were factored into total power sector emissions anyway. The unit of CO2 instead of CO2e indicates that they were not included here. Is this correct?

An answer would be much appreciated.

Thank you,

Magdalena Klemun

Research Assistant

Trancik Lab

Massachusetts Institute of Technology

Web Area: Carbon Pollution Standards