

This is a wide-ranging rule. In many ways it is a step forward, in others it is a step back.

Unfortunately, if you had to pick the single biggest winner of this rule, there is no question it would be natural gas. By 2030, the role of gas in our energy mix is expected to rise from 27 percent to 32 percent. According to one estimate, the rule is going to increase natural gas consumption by 40 percent between 2020 and 2030.

This should concern us for a number of reasons:

- The rule does not appropriately or accurately measure fugitive methane emissions, which, when factored into a lifecycle analysis of gas, may make it even dirtier than coal. Because it underestimates the levels of methane, it overestimates the possible savings from gas.
- More reliance on natural gas means more fracking, which means more contamination of our air and our water, more predatory leasing practices, and more corporate money spilling into our local, state, and federal elections to help purchase favorable regulations.

But the most dangerous thing about the rule isn't just that it encourages more gas—it is that it encourages more gas infrastructure. It is a signal from the federal government that the private sector should commit billions into every segment of the supply chain—into more pipelines, more compressor stations, more processing facilities, and obviously more gas-fired power plants. Once money has been sunk into these projects, it is exceedingly unlikely that investors will abandon them without recovering their costs, a process that could easily take decades, prolonging our fossil fuel addiction by another generation.

Worst of all, it prolongs our addiction at a time when alternatives are more reliable and affordable than ever. Citibank, hardly known for its progressive convictions, recently declared that we are entering “the age of renewables,” as wind and solar emerge as price competitive options for periods of peak demand.

And although we can always promise that the sun and the wind will be free, you cannot guarantee that natural gas is even going to be cheap. It is an incredibly volatile commodity used for a variety of competing purposes, from electricity and heating to chemical manufacturing and even transportation. Every one of these sources of demand is a potential source of electricity price volatility that could be passed along to consumers as our grid becomes more gas-dependent.

So when it comes to the future of this rule, I urge the EPA to not tie the future of our economy to a dirty and unreliable fuel, and instead keep the path clear for renewable energy and efficiency. Thank you.