



December 31, 2021

Please accept these comments on the December 22, 2021 Louisiana Climate Initiatives Task Force Draft Final Plan, from the Alliance for Affordable Energy.

At the direction of Governor John Bel Edwards in Executive Order JBE 2020-19 the Governor's Climate Initiatives Task Force, supportive planning team, and various advisory and working groups has undertaken perhaps the most complicated effort expected of a group of citizens in Louisiana's history: chart a path forward to eliminate greenhouse gas emissions within the state in order to mitigate the catastrophic impacts of climate change. This is a messy and intersectional effort for a state with a unique land, people, economy, and emissions profile, but an effort which is crucial for our survival. Without question Louisiana's future depends on decisions and actions that will follow the Task Force's 2022 final report. Once this report is complete, the question will remain: will the state's agencies and elected officials, appointed and elected to represent the interests of the people and land of Louisiana, undertake the actions necessary?

*The comments below should only be construed as a direct response to the draft report document, not political or media attention paid inside or outside the Task Force to certain projects or policies. Lack of response to any specific action should also not be read as tacit support or opposition by the Alliance for Affordable Energy.*

### **CLEAR CALL TO ACTION**

The draft final report, titled Louisiana Climate Action Plan, outlines Louisiana's complexities, ranging from social, environmental, engineering, political, to economic, and throughout highlights the **necessity of aggressive action**. The bulk of the report lays out vital solutions that would benefit the state even without the climate-driven imperative. Cleaner air, more affordable energy and housing, improved food systems, protected and stabilized wetlands, better coordinated government agencies, and an effort to identify federal funds to support the people of the state, while addressing economic instability for families and racial inequities are all outcomes that will improve life for Louisianans. Based on experiences in other states and countries, most of the proposed actions have proven successful at reducing emissions.

The draft final report is also clear about inaction. Simply put, if Louisiana maintains the status quo, slow walks “no regrets” solutions, and does not take decisive action in the coming years to reduce fossil fuel use, the state will not meet *any* of the goals laid out by the Governor’s executive order, and this effort will have been for naught. Increased harm is not only a risk it is a certainty. As the report explains on page 25, the Governor’s interim goals (2025 and likely 2030) are *already* out of reach because of the growth of the industrial sector in our state and historic lack of action.

**Therefore this report should be read as a call to action: half-measures, delays, and adding any new emissions must be halted.**

Using the Louisiana Energy Policy Simulator (EPS) tool, it is evident that there are three strategies that must be applied quickly: **1) Transition to renewable and clean electricity for all uses. 2) Electrify the industrial sector. 3) Switch to green hydrogen for industrial processes that cannot be electrified.** As suggested in the draft on page 27, this hydrogen should come from electrolysis, using renewable electricity, commonly referred to as Green Hydrogen. To transition using hydrogen generated from sources that emit additional GHGs, like Blue Hydrogen, would undermine the effort. Unfortunately, while the report explains these top three strategies on page 26 and on 105, the draft does not show explicitly the relative impact of the GHG reduction projected from these three, or *any* of the other recommended portfolio strategies or actions. This leaves any stakeholder guessing as to the emissions reductions projected from each action. **If the state is to move aggressively enough, and direct limited resources to the most impactful and likely successful strategies, the final report must not mince words.** Additional charts labeled with strategies/actions, or including likely emissions reductions associated with each strategy would support prioritization and give policymakers a sense of where to direct attention and resources in the short term.

The Alliance understands there are always modeling limitations, and that that some actions included here may not be readily modeled by the Energy Innovation EPS tool. However, at the very least, categorizing strategies or actions likely to represent more than (for example) 10% of emissions reductions, and on what timeline of likely implementation, would be useful for resource deployment. One example of how this can be done using the EPS can be found in a report described on page 29 of the draft<sup>1</sup> which models Louisiana following the Paris Climate Agreements, and provides a clear wedge chart of policy impacts with greater detail than the draft report’s Figure 8. Such an emissions reductions projection should also take into account or describe

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<sup>1</sup> Ashmoore, Olivia, Robbie Orvis, Zack Subin, Nathan Iyer, Lainie Rowland, Kyle Clark-Sutton, and Jun Shepard. November 2021. “Louisiana Energy Policy Simulator Insights: Current Emissions Trajectory, NDC Scenario. Energy Innovation. <https://energyinnovation.org/wp-content/uploads/2021/11/Louisiana-Energy-Policy-Simulator-Insights-Current-Emissions-Trajectory-NDC-Scenario.pdf>

the relative likelihood of success. Again, it is understood that there is uncertainty in developing industries, thus recommendations that carry such uncertainty must be clearly identified. If a technology or policy does not have a track record of success, stakeholders must be made aware.

Similarly, a potential timeline, or order of efforts should be included for stakeholders. For example, a read of this draft offers zero confidence that Action 26.2, to conduct a study on the potential impacts of CCUS will happen before Action 5.3, to support the development of CCUS. It would be absurd to conduct these actions simultaneously. The state certainly wouldn't undertake coastal restoration efforts without having conducted research and stakeholder efforts to understand impacts and success. As the report points out, there is well founded concern that the very same communities that have been forced and targeted to bear the burdens of Louisiana's industry will bear new burdens as un-tested "solutions" are prioritized. This simply must not be the case. In the continued interest of stakeholder participation and equitable outcomes, this report and its implementation must not simply extend historic practices. A timeline that puts people first, rather than full-steam ahead on uncertain new industrial efforts would signal this Task Force's intention to carry the objectives of creating a more Equitable Society and Improving Health and Quality of Life forward.

### **MISSING FROM THE REPORT**

An essential element is missing from this report: What happens if Louisiana takes the aggressive actions outlined in the plan, but also allows the continued growth of our industrial sector? Figure 8 on page 26 gets close to describing the irrationality of continued petrochemical growth while attempting to aggressively reduce GHG emissions. The math simply won't work. Even so, Figure 8 doesn't appear to model the various policies against the low or high potential intensity. Fundamentally the Task Force's final report should show a roadmap to zero, and how the state can reach zero under these potential futures.

There is no other state in the nation with the outsized proportion of industrial emissions that must be addressed here. And indeed, as the report describes, the state's unique vulnerabilities to both climate change and the impacts of industries that are driving it make aggressive action urgent. While politically complicated, from an emissions reductions perspective, one **clear answer to reduce industrial emissions is to reduce production of petrochemicals, exports of fossil fuels, and associated products.** Even while the draft report points out that international policy and market drivers may impact Louisiana's emissions and economy due to lower demand, unfortunately managed reduction of industry is never explored in the report. Instead, the objective of maximizing economic growth and "solving" emissions from incumbent industries remains the focus.

### **ADVISORY LENS**

The draft report describes the structure of the Climate Task Force (page 3) and its multiple advisory groups and sector committees. From the beginning of this process, stakeholders understood that these advisory groups would lend their expertise to provide some assessment of financial, legal, scientific, and equitable feasibility. While this final draft plan is robust in its offerings of possible actions, there is little information as to the financial or scientific feasibility of some of these policies. And while the implementation matrix (page 107) points out funding is required for nearly all of the actions, **approximate fiscal notes are not included, and little is described about technical feasibility.** Similar to the concern listed above about enumerating relative emissions reductions for various policies, this missing information makes it nearly impossible for stakeholders to understand the costs, benefits, and prioritization for each strategy or action.

## ACCOUNTABILITY

**Louisiana must have consistent and transparent GHG emissions tracking.** If anything, this report underscores the need for regular updates to the state's GHG inventory. On page 12 the report explains that not until half-way through the Task Force's work (mid-2021) was it evident that emissions had remained essentially flat since 2005. Annual GHG reporting is now commonplace internationally<sup>2</sup> and this inventory should be maintained and accessible to the public, policy makers, and the Climate Initiatives Task Force, which should continue to meet at least annually, as required by Section 5 of Executive Order JBE 2020-19. Without including this accountability and implementation measure in the final report, the Task Force will have already reduced the oversight and accountability initially designed by the Governor's office. Without regular tracking and attention, emissions are unlikely to fall. Climate action is simply not set it and forget it. And without an annual report card, stakeholders will not have the tools necessary to address shortcomings.

Additionally, the Comprehensive State Energy Planning effort that is apparently underway at the state's Department of Natural Resources should be included in any climate action implementation plan. In August 2020, DNR released Request for Proposal #3000015546 for Louisiana's first ever comprehensive state energy plan, which is necessary for the state to receive any competitive State Energy Program funds from the US Department of Energy. Unfortunately, this planning process has not been conducted in coordination with the Climate Initiatives Task Force, and its recommendations may run counter to this Task Force's final 2022 report, which is inexplicable and must not continue. In the coming years **a coordinated state energy plan will be fundamental to the success of climate action**, as the Governor's office undertakes coordination across multiple existing and new state agencies,

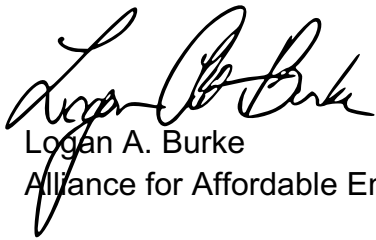
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<sup>2</sup> <https://www.cdp.net/en>

## CONCLUSION

The efforts of the planning staff, task force, and various stakeholder groups are obvious in this report, and the refrain is unmistakable: **take real and effective action now**. If this is to happen policy makers and the public deserve the additional information outlined above: expected emissions reduction impacts for strategies and actions, proposed timeline, consideration of reduced production/exports, scientific feasibility, and likelihood of success, more regular and transparent GHG tracking. Without this information, policymakers and community members are left with a list of 28 potential actions with no coherent way to begin.

Thank you,

A handwritten signature in black ink, appearing to read "Logan A. Burke". The signature is fluid and cursive, with the first name "Logan" being the most prominent.

Logan A. Burke  
Alliance for Affordable Energy