# Commentary: When it comes to emissions, N.Y. has an accounting problem

New York is right to preserve the 20-year timeframe for methane emissions accounting, but there's a larger problem that still needs fixing.

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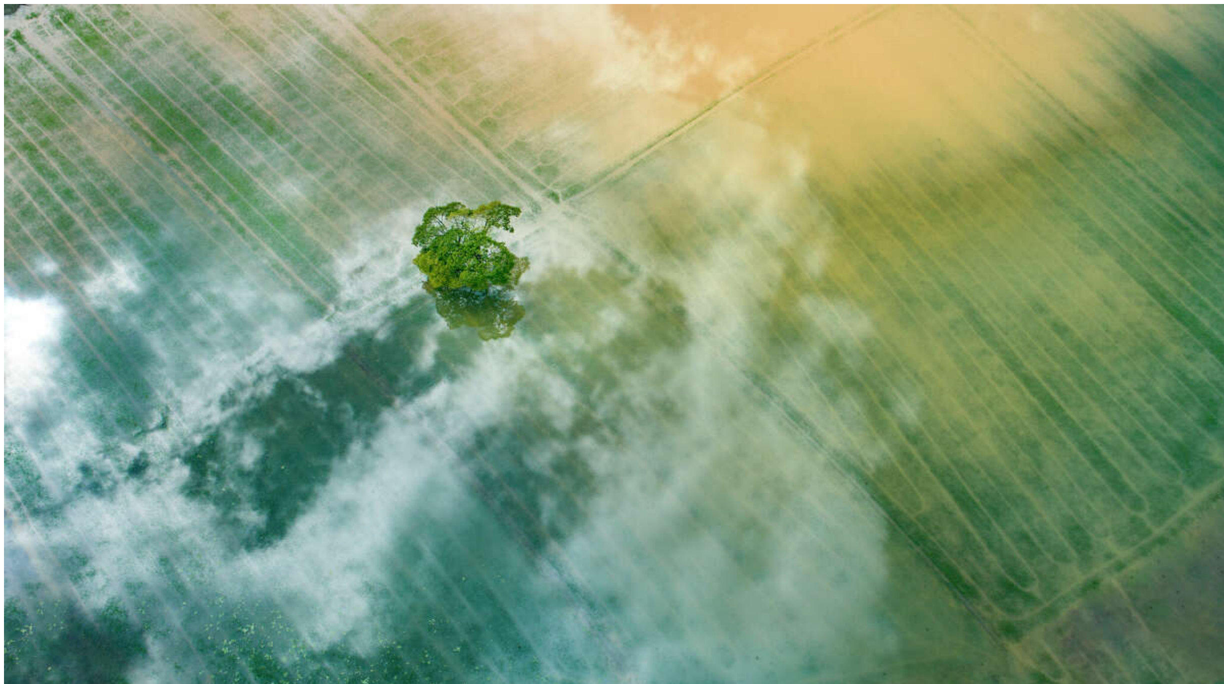

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New York's Climate Leadership and Community Protection Act is groundbreaking in many ways, including its recognition of the need to cut methane emissions rapidly. Gov. Kathy Hochul's proposal to extend the accounting timeframe for assessing methane emissions' impact from 20 to 100 years drew fierce opposition from climate scientists and environmental groups. She heard them and rightly reconsidered. But there's more to the story.

All other states except Maryland use a 100-year timeframe. New York's 20-year timeframe prioritizes cutting methane, which powerfully influences near-term warming, so it was worth fighting to keep. But that controversy

drowned out a bigger carbon accounting problem we still need to address: New York doesn't take full account of all greenhouse gas emissions from its energy use; it measures just a narrow slice.

The CLCPA currently counts only those emissions that come out of tailpipes, smokestacks, or other "point sources" in the state. Instead, it should use full life cycle carbon accounting, developed at Argonne National Laboratory. It's the gold standard used by the federal government and other states with ambitious climate laws.

Life-cycle accounting adds up *all* the greenhouse gas emissions that a fuel or energy source emits, from mining/extraction and production to transport and end-use. Think of point-source emissions as one snapshot, and lifecycle emissions as the whole movie of climate impact. The movie is what matters to the planet.

For example, consider emissions from natural gas vehicles running on fossil natural gas vs. renewable natural gas made from organic wastes. The two chemically similar fuels generate similar tailpipe emissions – that's the snapshot. Yet they have very different emissions over their life cycle – that's the movie.

The fossil gas life cycle includes fracking and drilling for underground methane formed eons ago, and leaking a lot of it into the atmosphere. Renewable natural gas's life cycle starts with capturing methane biogases generated by organic waste rotting above ground, *preventing* their release into the atmosphere, then refining them into a clean-energy fuel.

Life-cycle RNG emissions are therefore vastly lower than life-cycle fossil gas emissions (in fact RNG lifecycle emissions are often carbon-*negative*). Used strategically, RNG can lower overall GHG emissions by cutting methane emissions and displacing fossil fuels. Point-source accounting ignores this, which is unfair and unscientific. But life-cycle accounting reveals it.

The Inflation Reduction Act uses life-cycle accounting to select which carbon-cutting projects are eligible for funding. New York needs IRA-funded projects and their tens of thousands of jobs, which are backed by IRA prevailing wage and apprenticeship requirements. But if we stick with our outlier carbon accounting, IRA-financed projects in New York would have to keep two sets of books: one using life-cycle accounting to satisfy federal IRA requirements, and another using point-source accounting to satisfy state CLCPA requirements.

Project developers have flagged this as a deterrent. It makes us far less attractive for investment than states using life-cycle accounting and complicates our transition away from fossil fuels.

IRA-financed projects and jobs are too important to jeopardize. That's why the AFL-CIO supports shifting to life-cycle accounting and our environmental nonprofit does too.

New York's carbon accounting methodology must change. It was right to preserve the 20-year timeframe for methane emissions accounting, but the larger point-source accounting problem still needs fixing, and we hope Gov. Hochul will continue to prioritize it. To implement the CLCPA, it's critical to account for the full life-cycle impacts of what we do and to jump-start carbon-cutting projects now by helping attract IRA financing and private capital to the state. Switching to life-cycle accounting would enable faster climate action and a stronger climate leadership role for New York.

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