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MEMO

TO: EPD AIR PROTECTION BRANCH STAFF assigned to preparing and submitting Georgia's Climate Pollution Reduction Plan

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SUBJECT: Important requirement for reducing emissions is omitted in the draft plan being submitted

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It is overtly counterproductive for the plan to omit the explicit goal of reducing the dependency on fossil-fuels for generating electricity in Georgia. To be effective, accountable, and legitimate, the CPRP must set forth a series of actions to achieve measurable consistency between Georgia's energy policies and the plan's emission-reduction objectives.

While encouraging greater use of clean energy is necessary and commendable, it alone is woefully insufficient, especially due to the scientifically determined urgency of decisively curbing heat-trapping emissions to prevent the worst impacts of rising temperatures.

As you undoubtedly know, Georgia Power is proposing to expand the use of natural gas in producing electricity in Georgia, which poses major obstacles to achieving timely and substantial reductions in heat-trapping gases. It is well established that using natural gas risks leaks of methane, which, proportionally, have far greater heat-trapping consequences than CO₂. Methane leaks as little as 2% can make using natural gas worse than burning coal in terms of atmospheric heating impacts.

At the very least, the CPRP should propose a pragmatic initiative for detecting and measuring methane leaks, both within Georgia and those caused by Georgia's use of natural gas which occur outside the state – such as pipelines, wells, and processing operations, including LNG facilities. Accordingly, such leaks must be eliminated immediately, and future risks of additional leaks must be prevented by prohibiting further use of natural gas for power generation in Georgia.

As now proposed, Georgia's CPRP is unacceptably, unjustifiably incomplete and compromised by not seeking to restrict additional reliance on fossil fuels. This fundamental flaw in the plan results in its failure to best serve the crucial public interest in rapidly curbing emission of heat-trapping pollution.