

## **APPENDIX**

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**U.S. House of Representatives**  
**Committee on Commerce**  
 Room 2125, Rayburn House Office Building  
 Washington, DC 20515-6115

May 20, 1999

JAMES E. DERDEGAN, CHIEF OF STAFF  
 The Honorable Jacob Lew  
 Director  
 Office of Management and Budget  
 Old Executive Office Building, Room 252  
 17th Street & Pennsylvania Avenue, NW  
 Washington, D.C. 20503

Dear Director Lew:

As you know, the Committee on Commerce has long been interested in improving the scientific basis for Federal decision making, including regulatory decisions and decisions about allocation of Federal resources. We continue to seek to improve the quality of data and information used and disseminated by Federal agencies and by non-Federal entities with financial support from the Federal government.

Accordingly, we have undertaken a number of related actions, including establishment of the Risk Assessment and Management Commission and enactment of legislative provisions designed to enhance data quality, such as those in the Safe Drinking Water Act Amendments of 1996.

I am writing today in regard to one of Congress' recent actions to improve the quality of data and information used in Federal government decisions. Specifically, the Conference Report accompanying the FY 1999 Omnibus Appropriations Act (Pub.L. 105-277) includes provisions that call upon OMB to issue regulations to ensure and maximize the quality, objectivity, utility, and integrity of data and information used, generated, or disseminated by Federal agencies and by non-Federal entities with financial support from the Federal government.

The Risk Commission's 1997 report, the language of the Safe Drinking Water Act Amendments and the legislative and oversight record of Congress make clear that improving quality, objectivity, utility, and integrity of many federal risk information systems requires a change from intentionally-biased risk assessment and characterization practices to scientifically objective and unbiased processes. I have attached some quotations which outline the proper standard. Among other items, the Committee hopes that OMB regulations will help move Federal practice in this direction.

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The Honorable Jacob Lew  
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The Committee urges you to issue the necessary OMB regulations by September 30, 1999. We also urge you to assure that OMB requires Federal agencies to develop, within one year and with public participation, conforming rules consistent with the OMB rule. Finally, it is important that the OMB and conforming agency rules contain administrative mechanisms to allow affected persons to petition for correction of information which does not comply with such rules.

I am unaware of what activities OMB has underway to develop and implement the data quality regulations. I am concerned about OMB's performance in this matter, because the Paperwork Reduction Act of 1995 required OMB to issue such regulations on data quality, and OMB seems to have accomplished little over the last nearly four years to comply.

Please be assured that I am committed to improving the quality of the data used by the Federal government. Accordingly, please provide me, within the next two weeks, with a status report on what activities OMB has underway and/or planned to issue data quality regulations and how I might provide input into this process. If you have questions concerning this request feel free to contact Nandan Kenkeremath of the Committee staff at 226-2424.

Sincerely,

  
Tom Bliley  
Chairman


TJB:nk

cc: The Honorable C.W. Bill Young  
Chairman, Committee on Appropriations  
The Honorable Jim Kolbe  
Chairman, Subcommittee on Treasury, Postal Service,  
and General Government

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## 2013-11-12 Joint comment response to the published NOPR including joint petition dated Sep 4, 2013

This is a Comment on the **Energy Efficiency and Renewable Energy Office (EERE) Proposed Rule: 2013-09-11 Energy Conservation Program: Energy Conservation Standards for Commercial Refrigeration Equipment; Notice of proposed rulemaking and public meeting.**

For related information, [Open Docket Folder](#) 

Comment Period Closed  
Nov 12 2013, at 11:59 PM ET

**ID:** EERE-2010-BT-STD-0003-0079

**Tracking Number:** 1jx-88pb-47vd

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### Submitter Information

**Submitter Name:**  
William Kovacs

**Organization Name:**  
U.S. Chamber of Commerce

### Comment

See the attached comments filed on behalf of eight trade associations.

### Attachments (2)

DOE Commercial Refrigeration Equipment

[View Attachment:](#) 

**IQA Petition on Social Cost of Carbon**

[View Attachment:](#) 

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It is important to recognize that a number of key uncertainties remain, and that current SCC estimates should be treated as provisional and revisable since they will evolve with improved scientific and economic understanding. <sup>\*17779</sup> The interagency group also recognizes that the existing models are imperfect and incomplete. The 2009 National Research Council report mentioned above points out that there is tension between the goal of producing quantified estimates of the economic damages from an incremental ton of carbon and the limits of existing efforts to model these effects. There are a number of analytic challenges that are being addressed by the research community, including research programs housed in many of the Federal agencies participating in the interagency process to estimate the SCC. The interagency group intends to periodically review and reconsider those estimates to reflect increasing knowledge of the science and economics of climate impacts, as well as improvements in modeling.

In summary, in considering the potential global benefits resulting from reduced CO<sub>2</sub> emissions, DOE used the values from the 2013 interagency report adjusted to 2012\$ using the GDP price deflator. For each of the four sets of SCC values, the values for emissions in 2015 were \$11.8, \$39.7, \$61.2, and \$117 per metric ton avoided (values expressed in 2012\$). DOE derived values after 2050 using the relevant growth rates for the 2040-2050 period in the interagency update.

DOE multiplied the CO<sub>2</sub> emissions reduction estimated for each year by the SCC value for that year in each of the four cases. To calculate a present value of the stream of monetary values, DOE discounted the values in each of the four cases using the specific discount rate that had been used to obtain the SCC values in each case.

In responding to the NOPR, many commenters questioned the scientific and economic basis of the SCC values. These commenters made extensive comments about: The alleged lack of economic theory underlying the models; the sufficiency of the models for policy-making; potential flaws in the models' inputs and assumptions (including the discount rates and climate sensitivity chosen); whether there had been adequate peer review of the three models; whether there had been adequate peer review of the interagency TSD supporting the 2013 SCC values; [FN69] whether the SCC estimates comply with OMB's "Final Information Quality Bulletin for Peer Review" [FN70] and DOE's own guidelines for ensuring and maximizing the quality, objectivity, utility and integrity of information disseminated by DOE; and why DOE is considering global benefits of carbon dioxide emission reductions rather than solely domestic benefits. (See AHRI, No. 75; Joint Comment from America's Natural Gas Alliance, the American Chemistry Council, the American Petroleum Institute, the National Association of Home Builders, the National Association of Manufacturers, the Portland Cement Association, and the U.S. Chamber of Commerce (ANGA et al/Chamber of Commerce), No. 79; Cato Institute (Cato), No. 69; EEI, No. 89; GWU, No. 66; Mercatus, No. 72; NRECA, No. 88; Traulsen, No. 65. Several other parties expressed support for the derivation and application of the SCC values. (Joint Comment from the Environmental Defense Fund, Institute for Policy Integrity, Natural Resources Defense Council, and the Union of Concerned Scientists, No. 83; ASAP, No. 91; Kopp, No. 60)

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In response to the comments on the SCC values, DOE acknowledges the limitations in the SCC estimates, which are discussed in detail in the 2010 interagency group report. Specifically, uncertainties in the assumptions regarding climate sensitivity, as well as other model inputs such as economic growth and emissions trajectories, are discussed and the reasons for the specific input assumptions chosen are explained. Regarding discount rates, there is not consensus in the scientific or economics literature regarding the appropriate discount rate to use for intergenerational time horizons. The SCC estimates thus use a reasonable range of discount rates, from 2.5% to 5%, in order to show the effects that different discount rate assumptions have on the estimated values. More information about the choice of discount rates can be found in the 2010 interagency group report starting on page 17.

Regarding peer review of the models, the three integrated assessment models used to estimate the SCC are frequently cited in the peer-reviewed literature and were used in the last assessment of the IPCC. In addition, new versions of the models that were used in 2013 to estimate revised SCC values were published in the peer-reviewed literature (see appendix 14B of the DOE final rule TSD for discussion).

DOE believes that the SCC estimates comply with OMB's Final Information Quality Bulletin for Peer Review and DOE's own guidelines for ensuring and maximizing the quality, objectivity, utility and integrity of information disseminated by DOE. [FN71]

As to why DOE is considering global benefits of carbon dioxide emission reductions rather than solely domestic benefits, a global measure of SCC because of the distinctive nature of the climate change problem, which is highly unusual in at least two respects. First, it involves a global externality: Emissions of most greenhouse gases contribute to damages around the world even when they are emitted in the United States. Second, climate change presents a problem that the United States alone cannot solve. The issue of global versus domestic measures of the SCC is further discussed in appendix 14A of the DOE final rule TSD.

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