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I am concerned about how the Climate Commitment Act will regulate fugitive methane emissions. Fugitive emissions are a big problem that has been reported extensively in the media. Recently I saw a study in the Proceedings of the National Academy of Sciences which measured emissions over an eight year period and found them to be 2 to 10 times higher than EPA estimates. The researchers estimated losses of 3.3 to 4.7%. This is huge, and points to the importance of how these emissions are treated in the Climate Commitment Act.

But when I read the draft amendment, it is not clear whether pipelines are to be treated as suppliers or facilities. However it is done, it should be true that the entity that owns the pipeline is obliged to either fix the leaks, or pay a very steep price. Please don't allow these polluters to get off the hook either by dividing each pipeline into a separate entity or other obvious loopholes. I am not an expert (clearly) but I hope these comments are helpful.