



Edison Electric
INSTITUTE

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May 24, 2023

Article 6.4 Supervisory Body
United Nations Framework Convention on Climate Change (UNFCCC)
Secretariat Bonn, Germany
Submitted via E-mail: Supervisory-Body@unfccc.int

Re: Public comments on Annotated Agenda for SB 5 Meeting of the Article 6.4
Supervisory Body (May 31 – June 5, 2023)

To Whom it May Concern:

In advance of the upcoming meeting of the Article 6.4 Supervisory Body (SB 5), the Edison Electric Institute (EEI) would like to offer comments on the findings of the [Information note: Removal activities under the Article 6.4 mechanism](#) (A6.4-SB005-AA-A09).

EEI is the association that represents all U.S. investor-owned electric companies. EEI members provide electricity for more than 235 million Americans and operate in all 50 states and the District of Columbia. The electric power industry supports more than seven million jobs in communities across the United States. EEI members invest more than \$140 billion annually to make the energy grid smarter, cleaner, more dynamic, more flexible, and more secure; to diversify the nation's energy mix; and to integrate new technologies that benefit both customers and the environment. Across the nation, investor-owned electric companies are leading a clean energy transformation, making significant progress to reduce greenhouse gas (GHG) emissions in our sector, while also creating good-paying jobs and an equitable clean energy future. They are united in their commitment to get the energy they provide as clean as they can, as fast as they can, while keeping reliability and affordability front and center, as always, for the customers and communities they serve.

EEI has been an accredited business observer to the United Nations Framework Convention on Climate Change (UNFCCC) for over thirty years and has consistently advocated for policies and use of market-based mechanisms that accelerate the deployment of the broad portfolio of clean energy solutions to provide reliable, affordable, and secure energy and to mitigate climate change and address its impacts.

Of specific concern are the findings included in A6.4-SB005-AA-A09 *Table 3. Pros and cons of the different activity types being made eligible under the mechanism*. The table presents as a “con” that “engineering-based removal activities are technologically and economically unproven, especially at scale, and pose unknown environmental and social risks...” and that “these activities do not contribute to sustainable development, are not suitable for implementation in the developing countries and do not contribute to reducing the global mitigation costs, and therefore do not serve any of the objectives of the Article 6.4 mechanism.”

EEI does not agree with this assessment of the current state or potential of engineering-based removal technologies and believes that they should not be excluded from the full portfolio of technology solutions that are eligible under the 6.4 mechanism. In fact, the continued development of such technologies should be encouraged, as a broad and full suite of technologies will be required if countries are to meet the goals of the Paris Agreement. As other stakeholders have noted—see, e.g., comments from the International Emissions Trading Association—the IPCC and other internationally renowned institutions similarly do not share this assessment. In fact, these organizations and others have all highlighted the importance of using a wide range of tools including engineering-based removal activities for addressing the climate challenge.

EEI welcomes a “structured public consultation process to invite feedback from stakeholders,” as proposed in the cover note of the information note and urges the Article 6.4 Supervisory Body to schedule this process before any formal action is taken on this information note, including the development of recommendations requested by the CMA.

Please also see the submissions from the International Emissions Trading Association and Business Council for Sustainable Energy on removal activities under the Article 6.4 mechanism.

EEI appreciates the opportunity to share its views on this matter. Please contact Eric Holdsworth, Managing Director, Clean Energy and Environmental Policy (eholdsworth@eei.org) for additional information or questions.

Thank you for your consideration.