November 4, 2021

The Honorable Cecilia Rouse
Chair
Council of Economic Advisors
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

The Honorable Dr. Eric Lander
Director
Office of Science and Technology Policy
Eisenhower Executive Office Building
1650 Pennsylvania Avenue, NW
Washington, DC 20504

The Honorable Shalanda Young
Acting Director
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Chair Rouse, Acting Director Young, and Director Lander,

We write to request that you, the “Interagency Working Group on the Social Cost of Greenhouse Gases” (Working Group) Co-Chairs, provide the Working Group’s recommendations regarding “areas of decision-making, budgeting, and procurement by the Federal Government” where “Social Cost of Greenhouse Gases” (SC-GHG) may or are expected to be used.¹

President Biden’s Executive Order (E.O.) 13990 required the Working Group to provide those recommendations to the President by no later than September 1, 2021.² That deadline has lapsed and no insights have been offered to Congress or the American public on when and what to expect in these recommendations. This Administration has repeatedly failed to live up to its own commitment to transparency and “sharing accurate information with the American people.”³ The opaque decision-making process this Administration has chosen on this significant issue will result in policies that ultimately hurt American consumers who are already facing rising energy and grocery prices, slow economic growth, and uncontrolled inflation.

Given the potential wide-reaching application of the SC-GHG in decision-making, budgeting, and procurement, it is critically important for the Working Group to be transparent and accountable in its actions. The recommendations, if acted upon, will implicate serious policy decisions across the Executive Branch—decisions that will also have significant burdens and

---

¹ The SC-GHG consist of the “Social Cost of Carbon” (SCC), “Social Cost of Nitrous Oxide” (SCN), and “Social Cost of Methane” (SCM).
costs for state and local governments and the private sector and likely require funding or authorization from Congress.

As the Working Group continues to work behind closed doors, agencies are already using SC-GHG calculations in regulatory actions that impact all Americans. EPA has even gone so far as to strongly recommend the Federal Energy Regulatory Commission (FERC) use the SC-GHG in the certification of natural gas infrastructure and environmental impact statements. The use of SC-GHG and other derivations thereof will be cited in many regulatory actions this Administration is pursuing to implement its plans to take a "whole-of-government" approach to climate. EPA Administrator Michael Regan has confidently stated that regardless of any action by Congress "EPA is already aggressively using its rulemaking authority" and would be willing to wield broader regulatory authority to deliver on the Administration’s climate goals, especially the 50 to 52 percent emissions reduction goal outlined by the White House’s Nationally Determined Contribution (NDC).

Lawmakers—including members of the Senate Committee on Environment and Public Works—have repeatedly requested that the White House release the information and potential regulatory actions underpinning the NDC projections, but have received no response. This reaction from the White House is disturbingly similar to the Administration’s response on SC-GHG to date.

As a critical part of our oversight responsibilities, we need to know whether, how, and when the Administration plans to use these figures moving forward. It is vital that the American public have confidence in the Working Group’s activities, and we must understand the government’s justifications for future policies utilizing the SC-GHG that could exacerbate many of the ongoing economic challenges and labor disruptions the policies of this Administration have already caused. Filling our request to provide the recommendations to Congress is a necessary step for the Working Group to maintain public credibility and necessary transparency as it implements President Biden’s agenda.

---


7 Maxine Joselow, EPA head says he'll act on climate even if Congress doesn't, WASH. POST (Oct. 12, 2021), https://www.washingtonpost.com/politics/2021/10/12/epa-head-says-he-act-climate-even-if-congress-doesnt/.

We ask that you provide the Working Group’s recommendations, as required by E.O. 13990, no later than November 11, 2021. We look forward to your reply.

Sincerely,

Shelley Moore Capito  
Ranking Member  
Committee on Environment and Public Works

John Boozman  
Ranking Member  
Committee on Agriculture, Nutrition, and Forestry

Pat Toomey  
Ranking Member  
Committee on Banking, Housing, and Urban Affairs

Lindsey O. Graham  
Ranking Member  
Committee on the Budget

Roger F. Wicker  
Ranking Member  
Committee on Commerce, Science, and Transportation

John Barrasso, M.D.  
Ranking Member  
Committee on Energy and Natural Resources

Mike Crapo  
Ranking Member  
Committee on Finance

Richard Burr  
Ranking Member  
Committee on Health, Education, Labor and Pensions