

## The Concerned Household Electricity Consumers Council **ONCE AGAIN** calls on President Trump and EPA to Revisit and Revoke the Scientifically Invalid CO<sub>2</sub> Endangerment Finding

### Key Points:

- 1. Just Released, Even More Definitive research findings make it even more certain that CO<sub>2</sub> is not a pollutant but rather a beneficial gas that should not be regulated.**
- 2. If the Endangerment Finding is not vacated, whether the current administration likes it or not, it is certain that electric utility, automotive and many other industries will face ongoing EPA CO<sub>2</sub> regulation.**
- 3. This scientifically illiterate regulation will raise energy prices thereby reducing U.S. economic growth and jobs.**

May 22, 2017

The Concerned Household Electricity Consumers Council announces that on May 8, 2017 it filed with EPA a Supplement to the Council's January 20, 2017 Petition asking the Agency to reconsider the scientifically invalid Endangerment Finding on which all Obama-era greenhouse gas regulations are based. The Supplement may be found at:

<https://thsresearch.files.wordpress.com/2017/05/ef-checc-suppl-pfr-of-ef-050817-final.pdf>.

The Council's original Petition (See: <https://thsresearch.files.wordpress.com/2017/04/ef-epa-petitionforreconsiderationof-ef-final-1.pdf> ) demonstrated that the Endangerment Finding is nothing more than assumptions that have each been disproved by the most relevant empirical evidence from the real world. The original Petition was substantially based on a major peer-reviewed 2016 scientific paper by James Wallace, John Christy and Joseph D'Aleo (Wallace 2016) that analyzed the best available temperature data sets and "failed to find that the steadily rising atmospheric CO<sub>2</sub> concentrations have had a statistically significant impact on any of the 13 critically important tropical and global temperature time series data sets analyzed." The full text of Wallace 2016 may be found at: <https://thsresearch.files.wordpress.com/2016/09/ef-cpp-sc-2016-data-ths-paper-ex-sum-090516v2.pdf> .

The Supplement to the Petition now brings to the attention of EPA new developments, since the date of the Petition, that render the invalidation of the Endangerment Finding yet more definitive. First among the new developments is a new extensively Peer Reviewed April 2017 Research Report, also from Wallace, Christy and D'Aleo (Wallace 2017). Wallace 2017 can be found at:  
<https://thsresearch.files.wordpress.com/2017/04/ef-data-research-report-second-editionfinal041717-1.pdf> .

Wallace 2017 takes a totally different analytical approach than Wallace 2016, and specifically estimates the impacts of the key natural factors, including solar, volcanic and oceanic/ENSO activity, on tropical and global temperatures. It concludes that once these natural factor impacts on temperature data are accounted for, there is no “natural factor adjusted” warming remaining to be attributed to rising atmospheric CO<sub>2</sub> levels. That is, these natural factor impacts fully explain the trends in all relevant temperature data sets over the last 50 or more years. This research, like Wallace (2016) found that rising atmospheric CO<sub>2</sub> concentrations did not have a statistically significant impact on any of the (14) temperature data sets that were analyzed. **At this point, there is no statistically valid proof that past increases in atmospheric CO<sub>2</sub> concentrations have caused what have been officially reported as rising, or even record setting, temperatures.**

The Supplement to the Petition also demonstrates the improper use of Climate Models relied upon by EPA in the attribution of warming to human –related CO<sub>2</sub> emissions. Court records make it very clear that the premise of using climate models in attribution is that such models are properly validated, provide reliable forecasts, and are unable to reproduce observed warming without the additional forcing from anthropogenic Green House Gases (GHGs). Wallace (2016) and Wallace (2017) both independently demonstrate that this premise is false. Both reports show that natural factors alone explain all the warming. Conversely, Climate models show a pattern of warming in the tropical troposphere that simply does not exist in nature –the Missing Tropical Hot Spot. Thus, the Climate Models have been invalidated and cannot be relied upon by EPA for attribution analysis in its Endangerment Finding. Therefore, simple but insistent logic precludes the use of invalidated climate models to attribute warming to human emissions of GHGs, and requires reconsideration of the Endangerment Finding.

The Supplement to the Petition also puts in the record before EPA information from the March 29, 2017 testimony of John Christy before Congress which also dealt with the Missing Tropical Hot Spot issue. Dr. Christy's testimony can be found at: <https://science.house.gov/sites/republicans.science.house.gov/files/documents/HHRG-115-SY-WState-JChristy-20170329.pdf>. Dr. Christy's Congressional testimony showed that the temperature trend, projected by climate models on which EPA relies, differs from the actual trend of observations at the 99% confidence level. Thus, the models used by EPA to conclude that greenhouse gases pose a "danger" to human health and welfare have failed a simple "scientific method" test. They have been invalidated.

The scientific invalidity of the Endangerment Finding becomes more blindingly obvious and undeniable with each day's accumulation of empirical data. It is time for an honest and rigorous scientific re-evaluation of this Obama-era political document. The Nation has been taken down a tragically foolish path of pointless regulations and wasteful mal-investments to "solve" a problem which does not actually exist. Our leaders must summon the courage to acknowledge the truth and act accordingly.

The Council brought its Petition because the Obama-era greenhouse gas regulations threaten, as President Obama himself conceded, to make the price of electricity "skyrocket." All Americans will benefit from a new era where the cheapest sources of energy can also compete and prevail in the marketplace.