



# Estimating the Value of Carbon: Two Approaches

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# 1. Introduction

The value of carbon is a monetary estimate of the value associated with small changes in emissions of carbon dioxide (CO<sub>2</sub>) and other greenhouse gases (GHGs). Pursuant to the Climate Leadership and Community Protection Act (CLCPA), the New York State (NYS) Department of Environmental Conservation (the Department), in consultation with the New York State Energy Research and Development Authority (NYSERDA), is directed to establish by January 2021 a value of carbon for use by NYS agencies,<sup>1</sup> expressed in terms of dollars per ton of carbon dioxide equivalent (CO<sub>2</sub>e).<sup>2</sup>

In establishing a value of carbon for NYS, the CLCPA requires the Department to consider the two main analytic approaches for quantifying the dollar value of avoided CO<sub>2</sub> emissions. These are:

- The *social cost of carbon* (SCC) approach, or *marginal damages approach*, provides monetary estimates of the future environmental and social impacts caused by a small (1 metric ton) increase in greenhouse gas emissions in a given year. Equivalently, the SCC approach values the economic benefit that results from reducing greenhouse emissions by the same amount in that year.
- The *marginal abatement cost* (MAC) approach, or *target-consistent approach*, provides monetary estimates for greenhouse gas emissions based on the marginal abatement cost for achieving a given emissions reduction target—that is, the cost of abating the last metric ton of carbon dioxide needed to meet a particular emissions target at least cost to society.

The value of carbon is an important analytic input in policy deliberations and appraisal, including for benefit-cost analysis and regulatory impact assessment of policies that affect emissions and for estimating the economic benefits of existing climate policy. In applying the value of carbon, NYS policymakers can also be expected to evaluate policy options based on criteria such as their ability to deliver the specific emissions reductions required by the CLCPA and whether they will deliver such reductions at lowest cost.

In support of the Department's issuance of guidance on the value of carbon, this memo reviews both the SCC approach and the MAC approach to carbon valuation, with attention to specific considerations for the application of each approach to inform policy analysis and decisionmaking in NYS. This memo also presents associated estimates for the value of carbon, and certain other GHGs, issued and adopted by the US federal government, US states, and several European countries, including estimates that are calculated at a range of discount rates. Though the SCC and MAC approaches provide distinctly different information, they may play complementary roles in the NYS policy process to drive emissions reductions.

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<sup>1</sup> Governor Andrew Cuomo signed the *Climate Leadership and Community Protection Act (CLCPA)* into NYS law on June 18, 2019. Section 75-0113 of the CLCPA addresses the value of carbon.

<sup>2</sup> The emissions from various greenhouse gases are converted to carbon dioxide equivalent (CO<sub>2</sub>e) by multiplying by their global warming potential (GWP) over a specific timescale. As discussed in this memo, the social cost of carbon dioxide (SC-CO<sub>2</sub>) is the \$ damage per ton of CO<sub>2</sub>. Any other greenhouse gas, such as methane (CH<sub>4</sub>), would be multiplied by its respective GWP value to determine its CO<sub>2</sub> damage equivalent (e.g., tons CH<sub>4</sub>/ton CO<sub>2</sub>) and derive its \$ per ton CO<sub>2</sub>e. This memo suggests using direct estimates for the social cost of methane and the social cost of nitrous oxide, and developing direct estimates for the social cost of other common greenhouse gases, while using \$ per ton CO<sub>2</sub>e when a gas-specific estimate of social cost has not been established.

## 2. Social Cost of Carbon: Valuing Damages from Climate Change

In evaluating energy- and climate-related policy options, multiple NYS agencies currently use a *social cost of carbon* estimate<sup>3</sup> developed from a methodology that has been subject to broad stakeholder and peer review and issued by a US federal interagency working group. This section describes the mechanics of the SCC approach as well as ongoing research to refine this methodology. It identifies key decisions in its use, with specific focus on considerations for discounting and for non-CO<sub>2</sub> gases. The term SCC is used in this memo in a general sense to refer to the estimation of the marginal damages resulting from GHGs. The specific application of the SCC approach to evaluate the social costs of carbon dioxide, methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O) is referred to as SC-CO<sub>2</sub>, SC-CH<sub>4</sub>, and SC-N<sub>2</sub>O, respectively.

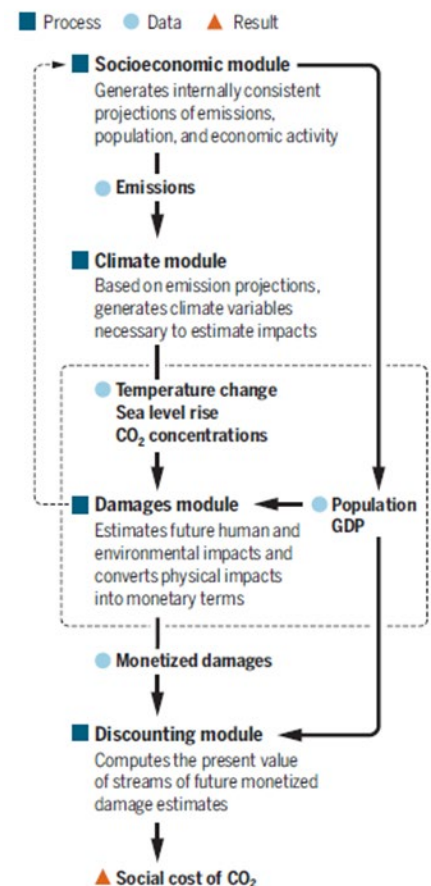
The SCC for a given year is “an estimate, in dollars, of the present discounted value of the future damage caused by a 1 metric ton increase in carbon dioxide (CO<sub>2</sub>) emissions into the atmosphere in that same year or, equivalently, the benefits of reducing CO<sub>2</sub> emissions by the same amount in that year” (NAS 2017). It is intended to be a comprehensive measure of net damages due to climate change from one additional ton of CO<sub>2</sub>, including changes in net agricultural productivity, human health, property damages from increased flood risk, and the value of ecosystem services (IWG 2010). SCC calculations take into account future costs because CO<sub>2</sub> emitted today will have consequences for centuries into the future.

SCC estimates are calculated using integrated assessment models (IAMs), such as the Dynamic Integrated Climate-Economy model (DICE); the Climate Framework for Uncertainty, Negotiation, and Distribution model (FUND); the Policy Analysis of the Greenhouse Effect model (PAGE); and the Regional Integrated model of Climate and Economy (RICE). The vast majority of SCC estimates in the academic literature use one or more of these models (Isacs et al. 2016). These IAMs link together a global economic model and a global climate model (Figure 1). IAMs simulate the cost of the expected incremental damage along an emissions pathway due to a small increase in CO<sub>2</sub> emissions released at a certain point in time. The IAMs account for future economic growth, population growth, and technological change, from which emissions

**Figure 1. Schematic of the Modeling Approach Taken by Integrated Assessment Models to Estimate the SCC**

### Computing the benefits of reduced climate change

Four modeling components are necessary to estimate the benefits from reduced climate change, summarized by the social cost of CO<sub>2</sub>. This figure illustrates those components and their linkages.



Source: Reproduced from Pizer (2017).

<sup>3</sup> The NYS Public Service Commission, Department of Public Service, and NYSERDA use the SC-CO<sub>2</sub> average estimate at the 3 percent discount rate that was issued by the federal Interagency Working Group in 2016, as discussed in this memo. These NYS agencies have used this value of carbon in setting zero-emission credit (ZEC) payments to at-risk nuclear generation power plants; to guide avoided CO<sub>2</sub> cost compensation to clean distributed generators; in benefit-cost analyses of utility energy efficiency programs and other utility expenditures that may impact CO<sub>2</sub> emissions; and in a range of analytic studies, such as to assess the statewide potential for increased adoption of energy efficiency and renewable energy technologies and to inform NYS policy on offshore wind energy and the Clean Energy Standard.

trajectories are defined. These trajectories are translated to climate impacts and then to monetized damages, with future damages converted into their present-day value by using a discount rate. The SCC is estimated as the net difference in total damage cost between the baseline case and the case with a small additional amount of CO<sub>2</sub> emissions. The model is typically run hundreds of thousands of times to evaluate the uncertainty of the estimates.

## 2.1. SCC at the Federal Level

Established by the US federal government in 2009, the Interagency Working Group (IWG) on the Social Cost of Greenhouse Gases developed estimates of the social cost associated with CO<sub>2</sub> emissions for use by federal agencies in regulatory impact analysis. The IWG last published SCC estimates in 2016.<sup>4</sup>

The IWG used three integrated assessment models—DICE, FUND, and PAGE—to estimate the global damages caused by GHG emissions. The IWG ran the three models through the year 2300 using five emissions scenarios: four business-as-usual trajectories featuring different technology assumptions, plus one policy trajectory in which atmospheric CO<sub>2</sub> concentrations stabilized at 550 parts per million. The IWG then averaged the results across the models and trajectories to produce four SCC values, three of which are based on the average SCC from the three IAMs at discount rates of 2.5, 3, and 5 percent. The fourth value represents the 95th-percentile SCC estimate across all three models at a 3 percent discount rate. The final value was included to capture the damages associated with lower-probability but higher-impact outcomes from climate change, which would be particularly harmful to society.

SCC estimates are subject to both structural uncertainty (related to the functional form of the underlying models) and parametric uncertainty (related to the values employed for the primary parameters). The IWG approach was intended to mitigate or characterize such uncertainty to the extent possible (NAS 2017).<sup>5</sup> Examples of uncertain elements in the SCC estimates include very long-run projections of socioeconomic variables, such as economic growth, population, and emissions; aspects of the climate system, including how sensitive it is to emissions; and the inadequate representation of catastrophic “tipping elements” in the climate system (Lenton et al. 2008). The IAMs only partially account for, or omit, many significant impacts of climate change that are difficult to quantify or monetize, including ecosystems, increased fire risk, the spread of pests and pathogens, mass extinctions, large-scale migration, increased conflict, slower economic growth, and potential catastrophic impacts (Howard 2014; Institute for Policy Integrity 2019; IWG 2010; NAS 2017). Further uncertainty comes from the extrapolation of damage functions to temperature increases above 2.5° to 3°C (Isacs et al. 2016). To the extent that the IAMs are used to estimate an SCC that is based on optimal climate policy, additional uncertainties lie in the abatement costs as well.

Table 1 shows the SC-CO<sub>2</sub> estimates published by the IWG in 2016, at five-year intervals through 2050, expressed in 2020\$ per metric ton of CO<sub>2</sub>. Although the average estimate at the 3 percent discount rate is

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<sup>4</sup> The IWG originally published SCC estimates in 2010, and subsequently issued four updates, all of which followed the 2010 methodology. The IWG estimates have been used for applications ranging from vehicle emission and fuel economy standards, to emission standards for industrial manufacturing and power plants, to energy efficiency standards. These estimates are also often applied at the state or local level and have been used internationally.

<sup>5</sup> The National Academies (NAS 2017) further assessed sources of uncertainty in the SCC estimates and offered extensive recommendations for both reducing them and improving their characterization. These specific recommendations are currently in the process of being implemented by RFF’s Social Cost of Carbon Initiative.

presented as the “central estimate,” the IWG emphasizes the importance of considering all four values for capturing uncertainty in the SCC estimates in regulatory impact analysis. The IWG also developed estimates for the social cost of methane and the social cost of nitrous oxide (Appendix A).

The range of IWG values shows the sensitivity of the SCC estimate to the discount rate assumption. The IWG’s 2016 update expanded the discussion of other sources of uncertainty about the SCC estimates, including presentation of quantified sources of uncertainty in the form of frequency distributions for the SCC estimates in 2020 (Appendix B) as well as discussion of model limitations and research gaps (IWG 2016).

**Table 1. Social Cost of CO<sub>2</sub>, IWG Estimates (2020\$/metric ton CO<sub>2</sub>)**

<b>Year of emissions</b>	<b>Average estimate at 5% discount rate</b>	<b>IWG central estimate: Average estimate at 3% discount rate</b>	<b>Average estimate at 2.5% discount rate</b>	<b>High-impact estimate: 95th percentile estimate at 3% discount rate</b>
<b>2020</b>	15	53	79	156
<b>2025</b>	18	59	87	176
<b>2030</b>	20	64	93	193
<b>2035</b>	23	70	99	214
<b>2040</b>	27	76	107	233
<b>2045</b>	29	81	113	251
<b>2050</b>	33	88	121	270

Source: Social cost of CO<sub>2</sub> estimates made by the IWG in 2016, converted into 2020\$ per metric ton of CO<sub>2</sub>. See Appendix E for Consumer Price Index (CPI) conversion rate used.

Presidential Executive Order 13783 disbanded the IWG in 2017 and removed the requirement for federal agencies to employ a harmonized set of SCC estimates in their regulatory analyses. Federal agencies subsequently have relied on a set of interim estimates based on the IWG methodology but with two modifications that significantly alter SCC values: attempting to calculate only damages occurring within the United States rather than global damages, and employing discount rates of 3 and 7 percent in their central analyses. At the 7 percent discount rate, the interim estimate for domestic SCC is just \$1 per metric ton of CO<sub>2</sub>. This estimate is inconsistent with the CLCPA’s direction to consider the global impacts of GHG emissions; moreover, it is methodologically flawed in that the existing IAMs do not model relevant interactions among regions (e.g., global migration, economic and political destabilization, impacts on trade, potential for reciprocity in climate mitigation) in the manner that would be necessary for more thoroughly estimating a domestic impact.

## 2.2. SCC at the State Level

Multiple states continue to use the IWG global SCC estimates in conducting cost-benefit analysis of energy-related regulations and other actions, including California, Colorado, Illinois, Maine, Maryland, Minnesota,

Nevada, New Jersey, New York, and Washington. The majority of these states use the IWG central estimate at the 3 percent discount rate, yielding an SC-CO<sub>2</sub> value of \$53 per metric ton for emissions occurring in 2020.

The state of Washington in April 2019 passed a law requiring utilities to use the IWG SCC estimate at the 2.5 percent discount rate (i.e., an SC-CO<sub>2</sub> value of \$79 per metric ton for 2020 emissions) when developing “lowest-cost analyses” for its integrated resource planning and clean energy action plans. The use of the 2.5 percent discount rate reflects the view that the IWG estimate does not capture the total future cost of CO<sub>2</sub> emissions because of omitted damages and uncertainty (Paul et al. 2017).

California’s Air Resources Board and Public Utilities Commission both use the IWG SCC. The former cites the SC-CO<sub>2</sub> and SC-CH<sub>4</sub> in its scoping plan for its updated climate change policy, adopting estimates at a range of discount rates from 2.5 to 5 percent. The latter requires use of the IWG SCC for evaluating distributed energy resources; utilities must conduct a societal cost test using the 3 percent SCC estimate and the high-impact estimate.

Additional information on use of the SCC in state policymaking is compiled by the Institute for Policy Integrity at NYU School of Law (see <http://www.costofcarbon.org/states>) (Paul et al. 2017; Grab et al. 2019) and is provided in a report issued by the US Government Accountability Office (GAO 2020).

## 2.3. Updating the SCC

In January 2017, the National Academies of Sciences, Engineering, and Medicine (NAS) published recommendations on updating SCC methodologies, prepared at the request of the IWG. The report provides extensive guidance to improve the scientific basis, provide more transparency, and better address uncertainties (NAS 2017). It also recommends instituting a process for updating SCC estimates approximately every five years, an update cycle that would balance the benefit of incorporating the latest research with the need for a thorough process.

The NAS report proposes four modules, each corresponding to a step in SCC estimation, and an overall framework that integrates the modules and considers their various interdependencies. The NAS panel suggests that using a common module for key steps in the SCC estimation framework, rather than averaging the results for different IAMs (as the current IWG methodology does), can improve transparency, consistency, and control over uncertainties. Each of the modules would allow for uncertainties, resulting in a distribution of estimates rather than a single value. As summarized below, for each module the NAS panel recommended changes that could be implemented in two to three years.

**Socioeconomic module and emissions projections.** These should use statistical methods and expert judgment for projecting distributions of future population growth and gross domestic product, which contribute to generation of GHG emissions projections. Potential modules should be evaluated according to time horizon, future policies, disaggregation, and feedbacks.<sup>6</sup>

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<sup>6</sup> Projections should extend far enough in the future to provide inputs for estimation of the vast majority of discounted climate damages; account for the likelihood of future emissions mitigation policies and technological development; and provide the sectoral and regional detail in population and economic conditions necessary for damage calculations. The module should incorporate feedbacks from the climate and damages modules.

**Climate modeling.** This module should use a simple Earth system model to properly capture the relationships among CO<sub>2</sub> emissions, atmospheric CO<sub>2</sub> concentrations, and global mean surface temperature change and sea-level rise; it should also incorporate their uncertainty.

**Climate impacts and damages estimation.** This module translates a time series of socioeconomic variables and physical climatic variables into estimates of physical effects and the associated yearly monetary value of net climate damages. It should be based on current models but include updated individual sectoral damage functions, transparent and quantitatively characterized damage function calibrations, recognition of any correlations between damage formulations, and a summary of disaggregated damage projections.

**Discounting.** To explicitly recognize the uncertainty surrounding discount rates over long time horizons, the discounting module should incorporate the relationship between economic growth and discounting using a Ramsey-like formula.

The NAS report further proposes longer-term research to improve each module and incorporate various feedback mechanisms that could have a significant effect on the resulting estimates.

Resources for the Future (RFF) and the Climate Impact Lab (the Lab) have begun to implement NAS recommendations in their research on the SCC.

RFF created the Social Cost of Carbon Initiative to advance the NAS framework proposals. This effort, focused on improving the scientific quality and transparency surrounding SCC estimates, involves a network of partners—RFF, UC Berkeley, Harvard, Princeton, University of Washington, PennState, and others (<https://www.rff.org/scc>). In partnership with David Anthoff and a research team at UC Berkeley, RFF hosts an open-source software platform and tools to run and adapt climate IAMs ([www.mimiframework.org/Mimi.jl/stable/](http://www.mimiframework.org/Mimi.jl/stable/)). RFF's research efforts to implement the NAS recommendations include building a new set of long-run projections of economic growth, population, and emissions; updating the climate model used in SCC calculations; building new climate damage functions from the best available literature; and implementing a Ramsey-like discounting framework. RFF plans to release updated SCC estimates that are responsive to the full set of near-term recommendations of the NAS by the end of 2020.

The Climate Impact Lab is working to leverage recent advances in sciences and economics to develop empirically derived climate damages and ultimately an SCC estimate. The Lab's approach includes gathering global climate and socioeconomic data to understand the relationship between climate and society, developing damage functions using outcome data, and using those observations to project the relationship where outcome data are not available. The Lab has created a web-based platform that presents the results of local assessments of climate impacts and is updated on an ongoing basis (<http://www.impactlab.org/map/>). It also plans to generate the first empirically derived estimate of the SCC based on a series of reports providing partial SCC estimates for a number of impact sectors, including mortality (Carleton et al. 2018), agriculture, conflict, labor, electricity demand. A broad timeline of 2021–2022 has been set to complete this work.

## 2.4. Choosing a Discount Rate

Economic discounting is the process of converting a value received in a future time period (e.g., 1, 10, or even 100 years from now) to an equivalent value received immediately. For example, a dollar received 50 years from now may be valued less than a dollar received today—discounting measures this relative value. The choice of



the discount rate used to calculate the SCC has a large influence on the estimate, with a higher discount rate resulting in a lower SCC value.

The CLCPA directs consideration of a range of appropriate discount rates, including a rate of zero. At NYSDA's request, RFF has employed the IWG methodology to calculate the SC-CO<sub>2</sub> for a range of constant discount rates (2, 1, and 0 percent) for comparison with values generated using the IWG's selected discount rates (5, 3, and 2.5 percent). Results from these sensitivity analyses are presented in Appendix C. Additional sensitivity analyses could apply a Ramsey-like approach to discounting (discussed below and in Appendix D).

The discount rate is a particularly important parameter for the social cost of carbon dioxide because the warming effects of emissions released today linger for hundreds of years into the future. Over such long time horizons, even modest changes in the discount rate can lead to large changes in the present value of long-term effects (Appendix C). It is not simply the sensitivity of the results that suggests careful consideration of the discount rate. Discounting over long time horizons also gives rise to other conceptual issues that affect the appropriate choice of the discount rate, such as intergenerational equity and uncertainties about the appropriate discount rate for the distant future.

#### **2.4.1. Consumption Discount Rate**

The social cost of carbon is used primarily for societal decision making, particularly as an input to benefit-cost analysis. The correct discount rate to use in a societal benefit-cost analysis is the social discount rate, which reflects the rate at which society as a whole is willing to trade off a value received at one point in time (e.g., today) with a value received at another point in time (e.g., the future). The IAMs used to generate the estimates of climate damages for SCC calculations report their output in terms of consumption-equivalent impacts, which are intended to reflect the effect on people's consumption (as opposed to investment). Therefore, and as explained in the NAS (2017) report, the correct discount rate to apply to these impacts is the consumption rate of discount.

Although the consumption discount rate is the appropriate one to use for the social discount rate in calculating the SCC, the analyst must still determine the right value to use for this rate. Broadly speaking, there are two approaches to choosing the social discount rate: descriptive and prescriptive. This memo focuses principally on the descriptive approach because it forms the basis of most US federal government guidance on discounting. The prescriptive approach primarily involves ethical judgments applied in the so-called Ramsey framework and is discussed below in the context of RFF's implementation of the NAS recommendations.

#### **2.4.2. Market Data and Expert Surveys**

**Descriptive approach using observed market data.** The descriptive approach is based on looking at people's observed behavior, as measured through market rates of return, and is the primary basis for US federal guidance on rulemaking procedures. For example, if households are willing to accept a 3 percent rate of return, this indicates that they are willing to trade off \$1 today for \$1.03 next year. Long-standing guidance in the Office of Management and Budget's (OMB) Circular A-4 directs federal agencies to use rates of 3 percent (reflecting the consumption rate of interest) and 7 percent (reflecting the pretax return to capital), based on observed historical market rates. Conceptually, the lower consumption rate of discount is appropriate for

evaluating effects (costs or benefits) on consumption.<sup>7</sup> OMB guidance also allows the use of additional lower discount rates as a sensitivity analysis if benefits or costs accrue to future generations over long time horizons.

When estimating the social cost of carbon for federal rulemaking, the IWG used a 3 percent central rate, a 2.5 percent “low” rate, and a 5 percent “high” rate. The 3 percent discount rate corresponds with OMB’s Circular A-4 consumption rate of interest. The 2.5 percent rate approximately accounts for uncertainty in future interest rates (and hence discount rates), which suggests using a lower interest rate for long time horizons (Weitzman 1998; Newell and Pizer 2003). The 5 percent rate was included to account for the possibility that climate damages are positively correlated with interest rates. These low and high rates were considered appropriate adjustments to approximate the implications of more complex discounting rules while retaining the constant discount rate approach.

The empirical basis for OMB’s rates of 3 and 7 percent is dated, and a 2017 US government report issued by the Council of Economic Advisers (CEA) examined recent trends in interest rates, finding support for using discount rates of “at most 2 percent” for the consumption rate of discount used in US federal policymaking (CEA 2017). This is based on the persistent decline in interest rates over the past two decades; prices in futures markets that suggest rates will remain below 4 percent over the next ten years or more.

Although the 2017 CEA report on interest rates primarily pertains to short-run forecasts (over the coming 10 years), interest rates in the far future (decades and centuries hence) are actually more relevant to discounting long-term climate change impacts. Although long-run interest rates are typically difficult to measure, a novel approach based on 100-year real estate leases suggests how investors discount values in the very long run (Giglio et al. 2015a),<sup>8</sup> with estimates implying discount rates “below 2.6 percent for 100 year claims.” Because real estate investments are not risk free, the risk-free rate may actually be overstated (Giglio et al. 2015b). This again suggests support for using long-run discount rates below 3 percent and probably closer to 2 percent, in line with the conclusion in the 2017 CEA report.

**Expert surveys.** An alternative way of determining discount rates is through surveying professional economists with relevant expertise and asking them to recommend values for the social discount rate. This approach relies on expert judgment, where the experts may implicitly or explicitly use a combination of descriptive and prescriptive approaches.

Weitzman famously conducted a survey of 2,160 professional economists, asking, “What real interest rate do you think should be used to discount over time the (expected) benefits and (expected) costs of projects being proposed to mitigate the possible effects of global climate change?” (Weitzman 2001). At that time, the responses showed a skewed distribution with a mean of about 4 percent, a median of 3 percent, and a mode of 2 percent.

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<sup>7</sup> In contrast, the return to capital is often proposed as the rate to use when private investment may be affected. This is a simplification of the more conceptually sound “shadow price of capital” approach, whereby effects on investment are converted to “consumption equivalents” and then all effects are discounted at the consumption rate of interest. In addition, Li and Pizer (2018) show that simply using the investment return is also problematic over long time horizons, and that under the shadow price of capital approach, the appropriate effective rate converges to the consumption rate over time.

<sup>8</sup> Specifically, they compare the market prices of 100-year real estate leases to the prices of owning equivalent properties in perpetuity. The difference in those prices reflects the discounted value of investment returns beyond 100 years, from which the authors infer the long-run discount rate that investors use.

Views in the economics profession have, however, shifted toward lower discount rates over the past two decades. Drupp et al. (2018) conducted a similar survey of more than 200 economists with expertise in discounting, finding median and mean recommended social discount rates of 2.0 and 2.3 percent, respectively. These results are in line with the range of 2 to 3 percent suggested by CEA (2017) and Giglio et al. (2015a). In addition to asking respondents to recommend a specific discount rate, the authors also inquired about the maximum and minimum rates they would feel comfortable recommending. The median (mean) upper bound recommended was 3.5 percent (4.1 percent) and the median (mean) lower bound was 1.0 percent (1.1 percent).<sup>9</sup>

In summary, existing relevant guidance and recent empirical and survey evidence suggest support for using a central discount rate for the SCC of 3 percent, 2 percent, or some value within this range.

### **2.4.3. Ramsey Approach**

One NAS recommendation for improving the SCC estimation process was to bring the descriptive and prescriptive approaches to the discount rate together by choosing “parameters for the Ramsey formula that are consistent with theory and evidence and that produce certainty equivalent discount rates consistent, over the next several decades, with consumption rates of interest” and using “three sets of Ramsey parameters, generating a low, central, and high certainty-equivalent near-term discount rate” (NAS 2017).

As part of its Social Cost of Carbon Initiative, RFF is implementing these NAS recommendations by determining the level of near-term discount rates using the descriptive approach and implementing them as part of a Ramsey-like framework (Appendix D).

For the near-term rates based on descriptive market information, RFF is focusing on central, low, and high discount rates of 3, 2, and 5 percent, respectively. The central 3 percent rate is consistent with current OMB guidance. RFF’s lower 2 percent rate is on the lower end of the range supported by the evidence and lower than the lowest value previously deployed by the IWG (2.5 percent). RFF’s high rate of 5 percent is based on OMB’s rate of return to capital of 7 percent, with an adjustment for taxes. This is because OMB’s 7 percent represents the pretax return to investment, but as explained above, the correct rate is the rate of return that consumers actually face. Since consumers must pay taxes on this 7 percent return, the corresponding rate of return actually available to consumers is about 5 percent.<sup>10</sup>

Under the Ramsey approach, the discount rate is given by two components, which are added together. The first component is called the rate of pure time preference, which is how much society discounts the welfare of people in the future. The second component represents an adjustment for how much the value of an incremental dollar declines as society grows wealthier.

If the intention behind the CLCPA’s required consideration of a “discount rate of zero” relates only to the rate of pure time preference between future and current generation’s welfare, and not to the adjustment for values accruing to wealthier individuals, then the effective discount rate under a Ramsey-like approach would simply

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<sup>9</sup> However, it should be noted that these are averages of the responses; some individual respondents recommended discount rates ranging from 0 to 10 percent, and an upper bound as high as 20 percent.

<sup>10</sup> See IWG (2010, 20). Although the IWG also used a 5 percent “high” rate, this was to approximately account for the potential positive correlation of the discount rate and climate damages, which the IWG did not model explicitly. RFF’s ongoing work explicitly models this correlation, implying the IWG’s rationale for using 5 percent is no longer applicable. It is simply a coincidence that the after-tax return to capital also happens to be about 5 percent.

equal the latter component. Using RFF's preliminary estimates of the size of this component, the effective near-term discount rate would equal about 1.7 percent (Appendix D). Germany has adopted a Ramsey-like approach to develop social cost of carbon estimates, including a high-impact estimate for use in sensitivity analysis that sets the rate of pure time preference at zero. In Germany's high-impact estimates, the effective discount rate starts near 2 percent and declines to 1 percent by 2250 (GAO 2020).

## 2.5. Social Costs of Other GHGs

In addition to carbon dioxide, the CLCPA covers methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), as well as "any other substance emitted into the air that may be reasonably anticipated to cause or contribute to anthropogenic climate change." In valuing carbon, the analytic tools employed by NYS should account for the contributions of these additional non-CO<sub>2</sub> gases to future economic damages as part of a consistent analytical framework.

The different physical characteristics of other greenhouse gases compared with CO<sub>2</sub>, as well as their distinct interactions within the atmosphere and biosphere, are important for the estimation of resulting damages. For example, the gases differ in their *radiative efficiency*—how much energy can be absorbed at a time on a per molecule basis. The physical and chemical processes that remove each gas, once emitted, from the atmosphere also differ, causing substantially different residence times in the atmosphere. Further, the physical and chemical interactions of these gases are also distinct, both in the atmosphere and with the biosphere. This section discusses two general approaches to account for these differences and generate values for the social costs of non-CO<sub>2</sub> greenhouse gases.

### 2.5.1. Global Warming Potentials

To facilitate comparison of characteristics across disparate greenhouse gases, climate scientists and economists often use the *global warming potential* (GWP). The GWP for a gas is calculated as the ratio of the cumulative energy absorbed by that gas over a particular time period, compared with a reference gas (CO<sub>2</sub>). The GWP metric expresses combined information about the radiative efficiency and the atmospheric lifetime of the gas relative to that of CO<sub>2</sub>. By construction, GWP values greater than 1 indicate greater warming than from CO<sub>2</sub>. For any two gases, the one with the higher GWP causes more warming over the specified time horizon.

GWPs for greenhouse gases for both 20- and 100-year time horizons are calculated and reported by the Intergovernmental Panel on Climate Change (IPCC) in its assessment reports (Table 2).<sup>11</sup> The potential for strong dependence of GWP on the selection of time horizon, particularly for relatively short-lived gases such as methane, is evident.

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<sup>11</sup> GWPs are published as part of the IPCC's Working Group I assessments and were most recently updated in 2013 as part of the IPCC's Fifth Assessment Report. The Working Group I contribution to the IPCC's Sixth Assessment Report is scheduled to be finalized in 2021.

**Table 2. Global Warming Potentials and Lifetimes of Select Non-CO<sub>2</sub> Greenhouse Gases**

Gas	Lifetime (years)	20-year GWP	100-year GWP
CH <sub>4</sub> (methane)	12.4	84–86	28–34
N <sub>2</sub> O (nitrous oxide)	121	264–268	265–298
SF <sub>6</sub> (sulfur hexafluoride)	3,200	17,500	23,500
HFC-134a (hydrofluorocarbon)	13.4	3,710–3,790	1,300–1,550
PFC-14 (perfluorocarbon)	50,000	4,880	6,630

Source: IPCC (2013, chapter 8). Where ranges are given, the upper (lower) values represent the GWP with (without) climate-carbon feedbacks. Climate-carbon feedbacks are not included for the values presented for SF<sub>6</sub> and PFC-14 (Myhre et al. 2013). HFC-134a and PFC-14 are examples of HFCs and PFCs that are in common use, but HFCs and PFCs as categories comprise many more compounds that vary widely in GWP and atmospheric lifetime.

It would seem straightforward to estimate the social costs of non-CO<sub>2</sub> greenhouse gases by multiplying their GWP for a given time horizon by the SC-CO<sub>2</sub>. Using GWP in this manner, however, mischaracterizes the relationship between the residence time of a gas in the atmosphere and the time profile of discounted future damages.

When the models used to estimate the SC-CO<sub>2</sub> calculate the undiscounted damages for a future year in response to an initial pulse of emissions, such damages depend on how much of the original pulse still resides in the atmosphere in that year. After estimating undiscounted future damages, they calculate the net present value of all future damages by discounting and summing them. The much shorter atmospheric residence time of methane, for example, means that a pulse of methane in a given year will have largely been removed from the atmosphere in a decade. Undiscounted damages associated with that initial pulse of emissions should therefore diminish more rapidly than damages from CO<sub>2</sub>.<sup>12</sup> Converting the value of the SC-CO<sub>2</sub> to a value for SC-CH<sub>4</sub> by multiplying by the GWP of CH<sub>4</sub> implicitly (and incorrectly) imposes the longer atmospheric lifetime of CO<sub>2</sub> on the calculation of the SC-CH<sub>4</sub>, mischaracterizing the relationship between its atmospheric lifetime and the net present value of damages from the initial emissions pulse.

Further complications from applying GWP in this context arise from the fact that other physical interactions considered in some of the models are not shared across the gases. One example is CO<sub>2</sub> fertilization: the presence of elevated levels of CO<sub>2</sub> in the atmosphere enhances the growth of certain plants. Elevated levels of CH<sub>4</sub> and N<sub>2</sub>O do not share this effect with CO<sub>2</sub>, but using GWP imputes such benefits to those gases, thereby underestimating their net damages.

Another inconsistency arises when using GWP to estimate the social cost of gases for future years. GWPs of various gases are calculated by the IPCC based on the energy absorption capacity of an additional ton of emissions relative to their *current* concentrations. In later years, the strength of the energy absorption of a given gas relative to CO<sub>2</sub> may change based on future emissions pathways. Using today's GWP therefore may not properly reflect the relative radiative forcing of these gases in the future.

<sup>12</sup> Among other effects, properly accounting for this relationship implies a relatively narrower difference between the higher and lower discount rates for CH<sub>4</sub> when compared with CO<sub>2</sub>.

## 2.5.2. Gas-Specific Marginal Damages

In 2016, the IWG followed the approach put forward by Marten et al. (2015) and published direct estimates for the SC-CH<sub>4</sub> and SC-N<sub>2</sub>O.<sup>13</sup> This approach modified the IAMs employed in the calculation of the SC-CO<sub>2</sub> to directly model pulses of the other gases in a manner reflecting their disparate physical properties and behaviors in the atmosphere and also incorporating the inputs and other assumptions employed as part of the IWG methodology.<sup>14</sup> Appendix C provides values for the SC-CH<sub>4</sub> and SC-N<sub>2</sub>O based on the IWG methodology and rates of discount, along with additional estimates for 2, 1, and 0 percent constant rates of discount generated by RFF for NYSDERDA.

The differing results from the IWG and GWP approaches can be measured by evaluating the “damage-ratio” for the former and comparing it with the relevant GWP for a particular time horizon. The damage ratio is the ratio of the value for the SC-CH<sub>4</sub> or SC-N<sub>2</sub>O to the value for the SC-CO<sub>2</sub> for a given discount rate. Table 3 shows representative damage ratios for CH<sub>4</sub> and N<sub>2</sub>O, calculated using the IWG framework, for a set of discount rates, which may be compared with the GWPs for CH<sub>4</sub> and N<sub>2</sub>O presented in Table 2. Damage ratios that are higher (lower) than a given GWP indicate that the IWG methodology would yield a higher (lower) value for the SC-CH<sub>4</sub> or SC-N<sub>2</sub>O than the GWP approach. Notably, direct estimates of the SC-CH<sub>4</sub> have a damage ratio of 29 for the 3 percent discount rate used for the IWG’s central estimate, which falls within the range of GWPs reported by the IPCC for the 100-year time horizon. Estimating the SC-CH<sub>4</sub> using a GWP calculated over a 20-year time horizon, however, would lead to an estimate nearly a factor of 3 greater than the IWG direct estimates.

**Table 3. Damage Ratios for SC-CH<sub>4</sub> and SC-N<sub>2</sub>O in 2020**

Discount rate	SC-CH <sub>4</sub> / SC-CO <sub>2</sub>	SC-N <sub>2</sub> O / SC-CO <sub>2</sub>
5%	46	408
3%	29	367
2%	22	358

Damage ratios of the social cost estimates for a given gas using the IWG methodology to the value for the SC-CO<sub>2</sub> for a given discount rate. A comparison of damage ratios and GWPs for a given gas allows for a comparison of the relative effects of the two approaches for estimating the social costs of that gas.

<sup>13</sup> The IWG’s initial 2010 issuance of the federal government’s guidance for the SC-CO<sub>2</sub> did not publish estimates of non-CO<sub>2</sub> gases, citing the limitations of the GWP approach as well as the paucity of estimates of social costs of non-CO<sub>2</sub> gases in the academic literature at that time.

<sup>14</sup> An idealized implementation of this approach would involve perturbing the emissions pathways for each of the two gases in the same way that the SC-CO<sub>2</sub> is calculated. However, in the versions of the models used by the IWG, only the FUND model features an explicit representation of emissions of other greenhouse gases other than CO<sub>2</sub>. In the versions of DICE and PAGE used by the IWG, the effects of other greenhouse gases are represented by exogenous radiative forcing pathways. Rather than explicitly modeling a pulse of CH<sub>4</sub> or N<sub>2</sub>O emissions in DICE and PAGE, the pulse of emissions was instead represented by the equivalent increase in radiative forcing that would result from a one-ton pulse of such emissions. To calculate the amount of increased radiative forcing in these models and account for the time evolution of CH<sub>4</sub> and N<sub>2</sub>O, a separate simple gas cycle model was used in which the emissions of CH<sub>4</sub> and N<sub>2</sub>O could be perturbed directly. For a full discussion of the methodology and review of other estimates of SC-CH<sub>4</sub> and SC-N<sub>2</sub>O see Marten et al. (2015).

The academic literature on direct estimates of non-CO<sub>2</sub> gases beyond CH<sub>4</sub> and N<sub>2</sub>O is sparse overall and particularly limited for the NYS context.<sup>15</sup> At present, no direct estimates that are fully consistent with the IWG methodology have been put forward by the IWG or reported in the academic literature for greenhouse gases beyond CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O.

Direct estimates of additional non-CO<sub>2</sub> gases consistent with the Marten et al. (2015) approach could be generated and made consistent with the IWG framework through additional research. Implementing the Marten et al. approach for additional gases would require estimates of the temporal profile of additional radiative forcing that would result from a 1 ton pulse of the specified gases in a given year, potentially generated by expanding the simple gas cycle model employed to represent additional gases.<sup>16</sup> A potentially more expedient research approach would be to use estimates of marginal radiative forcing generated by the IPCC for its calculations of GWP for an extensive range of gases.<sup>17</sup>

## 2.6. Considerations for Using the Marginal Damages Approach in NYS

In its consideration of the establishment and usage of value of GHG estimates based on a marginal damages approach, the Department will need to address the following decision and guidance points.

**Use of a peer-reviewed methodology.** If the Department follows a marginal damages approach to value carbon and GHG emissions, NYSDERDA views the SCC methodology developed by the IWG as the most credible marginal damage cost approach for NYS agencies to use in the near term, since it has been subject to broad stakeholder and peer review.

**Consideration of global impacts.** The CLCPA instructs the Department to account for the global impacts from GHG emissions in establishing a value of carbon, rather than accounting only for the harm experienced within US or NYS borders. The IWG methodology accounts for global impacts.<sup>18</sup>

**Application of the IWG SCC “central” estimate.** As discussed in this memo, uncertainty is pervasive in SCC estimates and the estimates omit or do not fully account for many important damage categories. In partial

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<sup>15</sup> Shindell (2015) estimated the “Social Cost of Atmospheric Release” for HFC-134a along with other short-lived greenhouse gases by calculating the temperature effects of pulses of these gases using a simplified climate model and estimating the resulting damages from such temperature perturbations based on the DICE model. Shindell’s method also accounts for non-climate effects on human health via degraded air quality, which is not natively accounted for in the Marten et al. approach. Waldhoff et al. (2014) used the FUND model to directly model estimates of the SC-SF<sub>6</sub>. These papers are limited in that they each utilize only one of the three models employed by the IWG and use different discounting assumptions and different underlying socioeconomic, climatic, and damage functions than the IWG used.

<sup>16</sup> For full consistency with the IWG methodology, the marginal effects of the gases would be modeled along emissions pathways for each gas that are consistent with the socioeconomic scenarios used by the IWG.

<sup>17</sup> A limitation of this approach is that the IPCC assumes that future atmospheric concentrations and climate remain fixed at their current levels in its GWP calculations, so the marginal radiative forcing estimates are not fully consistent with the emissions scenarios employed by the IWG.

<sup>18</sup> The IWG approach implicitly places the same weight on a dollar loss in the US as a dollar loss in the poorest regions in the world. An alternative approach discussed in the literature, and applied in Germany (GAO 2020; Bünger and Matthey, n.d.), produces an “equity weighed SCC” value that weights a dollar loss in poor regions more than a dollar loss in richer regions. Simply put, such an approach explicitly acknowledges that an incremental or decremental dollar has a larger welfare impact to a poor person than it does to a wealthy person.



recognition of this uncertainty, the IWG issued a range of four values to be used in regulatory impact analysis, ranging from \$15 to more than \$150 per metric ton of CO<sub>2</sub> emitted in 2020. NYSDERDA suggests that the Department treat the current IWG “central” SCC estimate (at \$53 per metric ton of CO<sub>2</sub> in 2020) as a lower bound for damages, consider adopting a higher central SCC value for use by NYS agencies, and develop guidance on when to use a range of SCC values in analysis.

**Time horizon.** NYSDERDA suggests adopting or modeling marginal damages estimates that account for impacts through the year 2300, consistent with the IWG method and the NAS (2017) findings.

**Discount rate.** The choice of the discount rate used to calculate the value of carbon has a large influence on the estimate, with a higher discount rate resulting in a lower value. The CLCPA directs consideration of a range of appropriate discount rates, including a rate of zero. Though no consensus exists on what approach or rate to use for discounting uncertain climate impacts over long time horizons, multiple lines of research as well as large-scale surveys of economists suggest support for using long-run discount rates below 3 percent, likely closer to 2 percent. In NYSDERDA’s view, it is appropriate that the discount rate used in estimating value of GHG reductions using the marginal damages approach ultimately incorporate both empirical data and public interest value judgments.

**Non-CO<sub>2</sub> GHGs.** The approach taken by the IWG in estimating the SC-CH<sub>4</sub> and SC-N<sub>2</sub>O addresses many of the limitations of the GWP approach. If the Department follows the IWG’s marginal damage approach to value CO<sub>2</sub>, NYSDERDA suggests that it should also follow the IWG approach to directly estimate the value of CH<sub>4</sub> and N<sub>2</sub>O, modified as appropriate to meet the requirements of the CLCPA. For other GHGs of relevance for which fully consistent estimates using the IWG approach are not currently available (PFCs, HFCs, SF<sub>6</sub>), NYSDERDA suggests that NYS facilitate near-term research to generate IWG-consistent estimates for these gases following one of the research approaches identified while establishing interim estimates based on multiplying the SC-CO<sub>2</sub> by the 100-year GWP for each gas. NYSDERDA notes that the CLCPA requires the usage of a 20-year time horizon for GHG accounting purposes; however, experience with the SC-CH<sub>4</sub> and SC-N<sub>2</sub>O, including the damage ratio comparisons discussed in this memo, suggests that damage estimates based upon a 100-year GWP are likely to be most comparable to those that would be derived from direct estimates for these gases.<sup>19</sup>

**Updating of SCC estimates.** This memo discusses two major research efforts that are under way to improve on the IWG methodology and merit consideration for future updates. NYS, along with other governments and entities, can benefit from researchers’ ongoing efforts to refine SCC estimates.

NYSDERDA suggests that the NYS agencies also develop companion materials that provide tips, examples, and FAQs to assist analysts who need instructions for applying the SCC estimates. For example, companion materials specific to energy sector analysts could be developed by NYSDERDA and the NYS Department of Public Service, in consultation with the Department, to address points such as how to account for inflation, how to combine an SCC estimate derived using a given discount rate with different discount rates for other cost and benefit streams, and how to aggregate SCC estimates with energy costs that incorporate some portion of the cost of CO<sub>2</sub> emissions. As such materials are developed or revised, NYSDERDA encourages NYS agencies to work with the Department to facilitate their sharing among relevant agencies.

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<sup>19</sup> The discrepancy between using the GWP approach and direct estimates is expected to be considerably less than the expected error introduced by leaving such gases out of analyses, thereby implicitly assigning a value of zero for damages from those gases. Leaving known greenhouse gases out of analyses would also run directly counter to the directives and intent of the CLCPA.



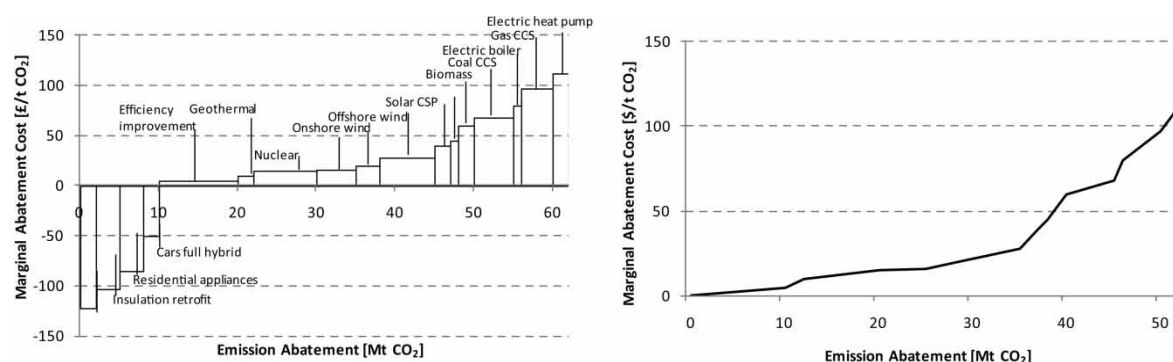
### 3. Marginal Abatement Cost: Evaluating Costs to Meet a Target

To achieve specified emissions goals at lowest overall cost, it is instructive to consider the marginal costs of reaching a specified emissions reduction target. The *marginal abatement cost* (MAC) approach has been incorporated by a number of governments in support of achieving their emissions targets. This *target-consistent approach* provides monetary estimates for greenhouse gas emissions based on the marginal abatement cost for achieving a given emissions reduction target—that is, the cost of abating the last metric ton of carbon dioxide needed to meet a particular emissions target at least cost to society (GAO 2020).. This section discusses the mechanics of the MAC approach, compares it with the marginal damage approach, and highlights relevant methodologies and estimates from three countries that have implemented a MAC approach. The section concludes by identifying relevant considerations if NYS incorporates the MAC approach to carbon valuation in policies or programs to achieve the emissions reductions required under the CLCPA.

The MAC approach relies on marginal abatement cost curves that represent the amount of GHG abatement that is available at a given “cost.” A MAC curve is a graph that indicates the marginal cost (the cost of the last unit) of emissions abatement for varying amounts of emissions reduction. A MAC estimate is typically derived from the marginal cost associated with the last reduced unit of emissions in the target year, which also equals the carbon price needed to meet the target (Isacs et al. 2016).

One approach to generating such MAC cost curves is to conduct a bottom-up assessment, in which experts evaluate individual abatement opportunities and costs across a set of relevant sectors and technologies. Abatement measures are arranged in order of cost per ton of emissions abated, from least to most expensive, to generate a marginal abatement cost curve. A stylized example of a MAC curve developed through such a bottom-up assessment is provided in the left panel of Figure 2.

**Figure 2. Stylized Depictions of MAC Curves Drawn from Expert-Based Approach (left) and Models (right)**



Source: Reproduced from Kesicki and Elkins (2012).

Alternatively, top-down MAC curves can be generated by using economic or energy models to evaluate the level of emissions reductions across an economy or a sector resulting from the imposition of a carbon price. A MAC curve can be generated in this way by varying the level and trajectory of the carbon price across multiple runs of the model and assessing the level of reductions driven at each price. MAC curves produced

through modeling studies, as depicted in the right panel of Figure 2, generally lack the level of detail about specific abatement opportunities available that are provided by expert-based studies (Kesicki and Ekins 2012). Modeling studies, however, offer the potential to account for interactions between sectors that are not accounted for with expert-based studies. Despite the significant differences between the two approaches, a review of the MAC literature found no consistent directional effect on estimated MAC curves based on the underlying modeling approach (Kesicki 2013).

Marginal abatement costs also have been determined based on historical and projected behavior in carbon markets such as the European Union’s Emissions Trading System (ETS) (see “MAC in Other Countries,” below).

### **3.1. MAC and SCC, Compared**

The relative values of the MAC approach and the marginal damage approach for analysis of climate mitigation have been discussed and debated in the academic literature (Isacs et al. 2016) as well as in official government policy documents (Department of Energy and Climate Change 2009). The selection of approach has additionally fallen along geographic lines. The governments of the United States, Canada, and Mexico rely primarily on the marginal damage approach in the form of the SCC to support benefit-cost analysis in regulatory analysis (US Climate Alliance n.d.). Several European countries, each with clearly defined emissions targets, have adopted the MAC approach.

The MAC approach and its supporting analysis can be tailored to align closely with country, state, or regional requirements for greenhouse gas reductions. This attribute has been commonly cited as imperative by countries that have adopted the MAC approach, as well as the related ability to support a consistent policy framework across a suite of government actions (DECC 2009; Ministère de la Transition écologique et solidaire 2018).

When considered in isolation, the MAC approach avoids certain uncertainties that affect SCC estimates (DECC 2009). For example, the MAC cost curve does not depend on a representation of the climate system; it is dictated solely by cost estimates to reach a specified target or atmospheric concentration.<sup>20</sup> Similarly, the MAC curve is not subject to uncertainty from translation of climate change to economic damages. Both of these sources of uncertainty have been shifted and subsumed into the policy decision of what the appropriate emissions targets and trajectories should be (Isacs et al. 2016).

Estimates of MAC curves are subject to a number of sources of uncertainty distinct from those present in the estimation of the SCC. These include uncertainty related to rates of technological improvements over time, the costs of available abatement, and the overall available potential for abatement, among others. MAC curves additionally share sensitivity to some of the same parameters as the SCC—namely, the selection of the reference case against which abatement costs are measured and the discount rate employed. MAC curves offer potential for more targeted and frequent updates as new information on technology costs and other costs of abatement is revealed in the marketplace, however, which could be expected to reduce uncertainty.

MAC curves also have limitations that should inform their development and use (Kesicki and Ekins 2012; Isacs et al. 2016). Cost curves in many cases lack a full accounting of costs, often excluding system costs and the costs of policy implementation, leading to an underestimate of the costs of abatement. MAC curves typically represent a snapshot in time, so they do not account for intertemporal uncertainty. Notably, MAC curves

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<sup>20</sup> Note that the translation of emissions to atmospheric concentration does involve associated uncertainty.

derived from the individual assessment of abatement measures do not typically account for economic interactions between sectors.

The following section discusses three countries' experience in choosing the MAC approach as their preferred strategy for carbon valuation: the United Kingdom, France, and Ireland. As summarized in Table 4, the countries' monetary estimates increase significantly over time, reflecting that abatement costs will rise over time as emissions targets become more stringent and as more expensive abatement measures will need to be employed, according to officials interviewed by the GAO (2020).

**Table 4. Monetary Estimates for Greenhouse Gases based on the MAC Approach Developed by France, Ireland, and the UK (2020\$/metric ton CO<sub>2</sub>e)**

	France	Ireland	UK (non-traded sectors, central value)	UK (ETS sectors, central value)
<b>2020</b>	107	55	106	20
<b>2030</b>	309	172	124	124
<b>2050</b>	775	455	355	355

Source: Appendices F-H provide country-specific sources. Estimates converted into 2020\$ per metric ton of CO<sub>2</sub>e. See Appendix E for exchange rates and Consumer Price Index (CPI) conversion rate used.

The NYS policy context is analogous to the countries discussed, in several ways. NYS is required under the CLCPA to achieve specific levels of emissions reductions, with differentiated requirements for the power sector. The NYS economy is set within a broader context of US states and other countries whose actions to mitigate climate change are dissimilar and largely disconnected. The decision points and actions taken by these countries to develop country-specific MAC curves are illustrative of the types of decisions that would need to be addressed by NYS in incorporating information based on the MAC approach.

## 3.2. MAC in Other Countries<sup>21</sup>

### 3.2.1. United Kingdom

The UK government began considering the use of MAC values in 2009, when the Department of Energy and Climate Change (DECC) conducted a major review of its use of the SCC for carbon valuation and laid the foundation for a transition to the MAC approach (DECC 2009). The primary reasons cited for the transition were to eliminate the uncertainty about damage cost estimates and to align UK policies with emissions reductions targets at the national level, as well as targets stipulated by the European Union (EU), and the United Nations. This review was followed by a subsequent policy document in 2012 that built on that foundation to establish the methodology and technical basis for the calculations that are in use today (DECC 2012).

<sup>21</sup> All carbon values present in the following examples have been converted from their original currencies and inflated into 2020 USD. See Appendix E for the rates used, and Appendices F, G, and H for their original values.

For purposes of carbon price valuation, emissions from UK source categories are divided into those that fall under the European Union's ETS and those that derive from non-ETS sectors. This distinction was made because the two emissions categories are subject to different emissions reduction targets, and emissions reductions between ETS and non-ETS sectors are not fungible. The United Kingdom established separate methods for valuing the costs of abatement between the two, resulting in the evaluation and application of both a short-term "traded price of carbon" for emissions from covered ETS sectors and a short-term "non-traded price of carbon" for non-ETS sectors.

For ETS sectors, DECC in 2009 outlined an approach to generate short-term traded carbon values that would incorporate market information, suggesting that the carbon trading markets offered the best source of information about abatement costs. The proposed approach, implemented in 2012, based a central scenario for abatement costs on futures prices for EU allowances. In addition to the central estimate based on market futures prices, models are used to generate one low-cost and one high-cost trajectory to characterize potential uncertainty about the central estimate.<sup>22</sup> Values for the traded price of carbon based on each of the three scenarios are updated on an annual basis. The most recent low, central, and high values for the year 2020 are \$0, \$20, and \$39 per metric ton of CO<sub>2</sub>e (Department for Business, Energy and Industrial Strategy 2019). The full schedule of short-term values is available in Appendix F.

The nontraded cost of carbon estimated for assessing policy actions in non-ETS sectors is based on an assessment of the "feasible technical" abatement options available carried out by the UK's Committee on Climate Change (CCC). In its assessment, the CCC generated six MAC curves based on varied assumptions about the feasibility of abatement opportunities across various sectors. Given the information in these MAC curves, DECC established a lower, central, and upper schedule for the nontraded carbon price. For 2020, the low, medium, and high values were \$53, \$106, and \$160 per metric ton of CO<sub>2</sub>e (DBEIS 2019). The relatively higher projected costs of abatement for non-ETS sectors compared with those covered by the ETS reflect the higher cost of abatement in non-ETS sectors, such as transportation, relative to the less expensive abatement options available in ETS sectors, such as power generation.

Beyond 2030, when a comprehensive global trading system is expected to be in place, the values for the traded and nontraded prices of carbon are assumed to converge to a single international carbon price modeled to meet the EU's target of keeping global warming below 2°C. The low, central, and high unified carbon values for 2030 are \$62, \$124, and \$186 per metric ton of CO<sub>2</sub>e; and for 2050, the corresponding values are \$177, \$355, and \$532 (DECC 2009).<sup>23</sup>

### **3.2.2. France**

As part of its 2018 update to its national low-carbon strategy (Ministère de la Transition écologique et solidaire 2018), the French government formed a commission to update the shadow price of carbon values employed in the assessment of public investments and climate mitigation opportunities (Quinet 2019). In its report, the commission considered employing the social cost of carbon approach but instead recommended

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<sup>22</sup> Market fundamentals are altered in the models to generate either a low-cost (e.g., chronic oversupply of allowances) or high-cost (e.g., high economic growth) scenario. The MAC curves used in the model-based approach are taken from the Enerdata POLES model, a top-down global sectoral model for the world energy system.

<sup>23</sup> Prices are linearly interpolated, as necessary, between 2020 and 2030 and between 2030 and 2050.

taking a marginal abatement cost approach consistent with delivering France’s economy-wide target of net-zero emissions by 2050.

Rather than put forward separate prices for various emissions sectors or categories (e.g. ETS and non-ETS), the commission instead recommended establishing a uniform shadow price across the economy to maximize economic efficiency. It further focused on establishing abatement cost curves for the year 2030 as a relevant “anchor point”. 2030 was selected on the basis of its relevance for setting near-term expectations and initiating public and private investments in low-carbon programs as well as the robustness and reliability of economic and technical modeling over that time frame (Quinet 2019).

To assess the abatement cost potential, the commission employed a pair of techno-economic models (TIMES and POLES) and three sectoral macroeconomic models (IMACLIM, ThreeME, and NEMESIS). These models were deemed sufficiently robust to quantify shadow prices supporting up to a 75 percent reduction in emissions from 1990 levels but were considered insufficient to evaluate the deep decarbonization required in the later years of the period. Based on this set of analyses, the commission proposed setting a 2030 shadow price of carbon of \$309 per metric ton of CO<sub>2</sub>e, a substantial upward revision from the previous value for the year 2030, \$136 per metric ton of CO<sub>2</sub>e, which had been established in 2008. Carbon values for the years between 2018 and 2030 were proposed to rise linearly from the 2018 value of \$67 per metric ton of CO<sub>2</sub>e to meet the shadow price established for 2030. See Appendix E for conversion and inflation rates used to translate 2018 EUR to 2020 USD.

Concerns about the ability of the models employed to explore deep decarbonization scenarios led the commission to integrate several approaches to establish values for the shadow price of carbon beyond 2030. The integrated approach included output from the techno- and macroeconomic models through roughly 2040, foresight on the portfolio of enabling technologies required for full decarbonization, and calibration of the shadow price on a Hotelling rule<sup>24</sup> from 2040 for a 4.5 percent rate of discount. The resulting trajectory yielded a \$617 per metric ton of CO<sub>2</sub>e carbon value in 2040 and \$957 per metric ton of CO<sub>2</sub>e in 2050.

In addition to its exploration of structural uncertainty in the estimates through the use of models of differing types, the commission studied and reported on uncertainty in the estimates related to the level of international cooperation. It evaluated scenarios representing delayed domestic or international action, which would have the effect of increasing the estimates, as well as the potential for increased international cooperation leading to the development of disruptive technologies. The commission did not explicitly publish a range of estimates based on these sensitivities.

### **3.2.3. Ireland**

Ireland has implemented an abatement cost model for use in evaluating potential public investment projects across all sectors of the economy (Kevany 2019). The Irish government opted against the SCC approach, citing concerns over its level of uncertainty. The MAC approach was considered to entail lower overall

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<sup>24</sup> The Hotelling rule indicates that, in order to maximize the present value of a non-renewable resource extracted over a given period, the percentage change per unit time in the net price of the resource should equal the discount rate (Hotelling 1931).

uncertainty, limited to the selection of the appropriate climate target to use and the actual abatement cost of reaching the target (Kevany and Cleary 2018).

Ireland's carbon valuation is based on the estimated societal marginal cost to reach Ireland's 2030 emissions target of 30 percent below 2005 levels by 2030. Estimates made for abatement costs for energy sector measures, as compiled in Ireland's National Mitigation Plan, are a proxy for economy-wide abatement costs. Specifically, the TIMES energy system model was used to create estimated MAC curves, and the price trajectory provided by the model was smoothed over time, starting at \$34 per metric ton of CO<sub>2</sub>e in 2019, rising to \$55 in 2020, and reaching an estimated \$172 by 2030. These values apply only to non-EU regulated carbon emissions (Kevany and Cleary 2018).

Ireland's approach does not use MAC curves to estimate values past 2030 in light of increasing uncertainty over technology costs and the potential for their rapid change over longer time horizons. Instead, the value employed is proposed to rise by 5 percent a year beyond 2030, yielding values per metric ton of CO<sub>2</sub>e of \$220 in 2035, \$280 in 2040, \$357 in 2045, and \$455 in 2050 (Kevany and Cleary 2018).

### 3.3. Considerations for Using the Marginal Abatement Cost Approach in NYS

As NYS State Agencies evaluate the potential for incorporating MAC information in policy analysis supporting implementation of the CLCPA, the Department will need to work with NYS Agencies to address the following decision and guidance points to ensure a consistent application of the MAC approach, where warranted.

**MAC curve development.** There is a firm foundation of MAC information on which the NYS power sector can base a MAC curve, but information for other sectors of the State's economy varies in availability and level of detail. In NYS, as in many other jurisdictions, the power sector has led other sectors in emissions abatement. Analysis consistently concludes that the power sector is structurally able to reduce emissions at lower cost than other sectors (Barron et al. 2018). By virtue of its long-standing renewable energy credit (REC) market, NYS has significant experience with assessing real-world cost signals required to deploy targeted levels of renewable electricity. Continued experience with the REC market could be used to update MAC information on an ongoing basis. In addition, the NYS power sector has recently been the subject of a detailed analysis to assess technology costs and renewable resource availability, among other relevant variables, directly in support of policy design to meet its targets for clean and renewable energy, as required by the CLCPA (New York State Department of Public Service and NYSEDA 2020).

NYSEDA also has engaged Energy and Environmental Economics to develop a strategic analysis of the State's decarbonization opportunities. This ongoing analytic work models portfolios of GHG reduction measures that will be needed to achieve the State's economy-wide 2030 and 2050 emissions reduction targets, with focus to date on the electricity, transportation, buildings, and industrial sectors (Energy and Environmental Economics 2020). Inputs to the models used in this work include cost and performance characteristics of both supply-side infrastructure and demand-side technologies. As this analysis is refined to inform the CLCPA policy process, it would allow NYS to accelerate the development of MAC curves for the initial focal sectors. Additional analytic work is needed to improve characterization of noncombustion GHG sources (such as landfills) and associated mitigation opportunities, as well to assess the potential quantity and cost of sustainable bioenergy resources, suggesting that the development of MAC curves for these sectors may take longer.

**Multiple curves versus a single curve.** A MAC approach could be applied to evaluate policies across the NYS economy, either by applying separate MAC values for policy actions related to specific sectors (e.g., a power sector MAC curve applied to assess power sector policies, and a transportation MAC curve applied to assess transportation sector policies) or by uniformly applying a MAC curve based on abatement cost estimates across the NYS economy to reach the economy-wide targets. In selecting between these two approaches, NYSERDA notes that it is economically rational for policymakers to seek to advance progress in the power sector in a manner that recognizes the relatively low cost at which emissions reductions may be achieved, compared with other sectors.

**Holistic view of abatement costs.** MAC information should ideally be incorporated in a manner that considers interactions between sectors as well as economy-wide goals. As discussed above, MAC curves are often developed for a particular sector using an approach that does not take into account potentially important interactions with other sectors. For example, meeting renewables targets in the power sector will affect electricity prices, thereby affecting the economics of consumer decisions related to vehicle electrification. Bottom-up MAC curves developed in isolation for the power and transportation sectors, however, typically would not account for this interaction. This underscores the importance of considering how a MAC approach would be applied across multiple sectors and fit coherently with the various policy approaches being taken by NYS.

**Updating of MAC curves.** MAC curves, once developed, would need to be maintained and periodically revisited to stay current with both the state of technology and evolution of the policy context. The limited applicability of the curves beyond NYS suggests that continual maintenance will likely require an ongoing commitment of resources by NYS and would ideally be planned for in advance.

## 4. Conclusion

This memo has assessed specific considerations related to analytic approach, discount rates, and prior estimates for valuing carbon in support of the Department's issuance of guidance on the value of carbon for use by NYS agencies.

NYSERDA notes in closing that there is an inherent policy interest in preserving the freedom for NYS policymakers to pursue the most economically rational abatement opportunities to their fullest potential. Although the statutory language in the CLCPA is suggestive of the identification of a uniform value for carbon, NYSERDA suggests that the Department in its guidance could take into account the value of information from both the SCC and the MAC analytic approaches, potentially providing some flexibility in applying the identified value of carbon in policymaking. It may be sensible for NYS agencies to use distinct approaches for different sectors, for example developing a MAC value for the power sector and using an SCC estimate for other sectors, or (in time) developing separate MAC values for policy actions related to specific sectors. It is important that such flexibility be coupled with Department guidance for those different sectors and implementing agencies, with attention to cross-sectoral dynamics and the role for each sector as part of New York State's holistic strategy to drive the economy-wide GHG emissions reductions required under the CLCPA. Relatedly, an outcome to avoid is allowing individual agencies or analysts to select their approaches on a discretionary or case-by-case basis, because of the absence of clear guidance that is rooted in a holistic CLCPA strategy.

Achieving the ambitious requirements of the CLCPA will require deep emissions reductions across the entire NYS economy and will necessitate detailed planning and policy evaluation across a disparate set of economic sectors. Both the SCC approach, with its focus on global societal benefits realized from the reduction of greenhouse gas emissions, as well as the MAC framework, with its focus on costs to achieve the required targets, can provide relevant, and in many ways complementary, information to NYS policymakers in this context.



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## 6. Appendices

### Appendix A. Social Costs of Methane and Nitrous Oxide, IWG Estimates

**Table A1. Social Cost of Methane Estimates (2020\$/metric ton CH<sub>4</sub>)**

Year of emission	Average estimate at 5% discount rate	IWG central estimate: Average estimate at 3% discount rate	Average estimate at 2.5% discount rate	High-impact estimate: 95th percentile estimate at 3% discount rate
2020	687	1,527	2,036	4,071
2025	827	1,781	2,290	4,707
2030	967	2,036	2,544	5,343
2035	1,145	2,290	2,926	6,234
2040	1,272	2,544	3,308	6,997
2045	1,527	2,926	3,562	7,761
2050	1,654	3,181	3,944	8,524

Source: Social cost of CH<sub>4</sub> estimates made by the IWG in 2016, converted into 2020\$ per metric ton of CH<sub>4</sub>. See Appendix E for Consumer Price Index (CPI) conversion rate used.

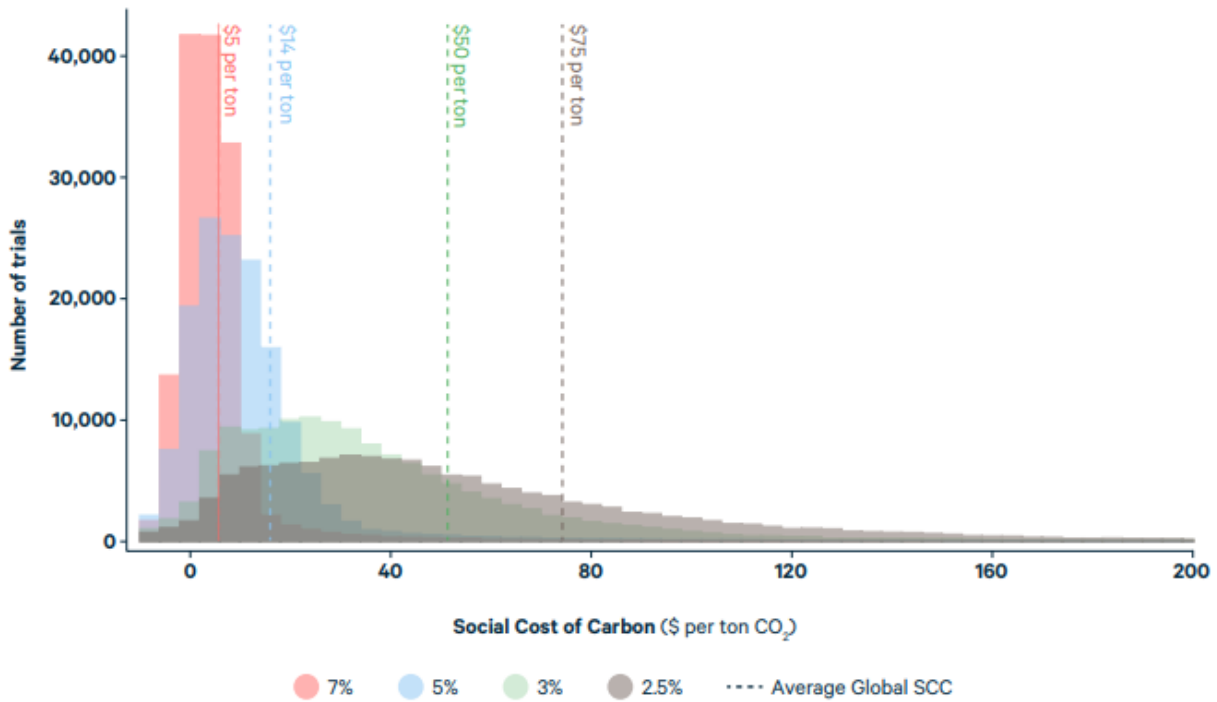
**Table A2. Social Cost of Nitrous Oxide Estimates (2020\$/metric ton N<sub>2</sub>O)**

Year of emission	Average estimate at 5% discount rate	IWG central estimate: Average estimate at 3% discount rate	Average estimate at 2.5% discount rate	High-impact estimate: 95 <sup>th</sup> percentile estimate at 3% discount rate
2020	5,980	19,084	27,989	49,617
2025	6,997	21,628	30,534	55,978
2030	8,015	24,172	34,350	62,340
2035	9,415	26,717	36,895	69,973
2040	10,687	29,261	40,712	76,334
2045	12,086	31,806	43,256	83,968
2050	13,995	34,350	47,073	91,601

Source: Social cost of N<sub>2</sub>O estimates made by the IWG in 2016, converted into 2020\$ per metric ton of N<sub>2</sub>O. See Appendix E for Consumer Price Index (CPI) conversion rate used.

## Appendix B. Range of IWG SC-CO<sub>2</sub> Values

Figure B1. Range of Values for SCC in 2020 (2019\$/metric ton CO<sub>2</sub>)



Source: Reproduced from Rennert and Kingdon (2019)

## Appendix C. Estimated SCC of Selected GHGs

The following tables show the social cost of carbon dioxide, methane, and nitrous oxide estimates for the year 2020 at different constant discount rates. Each of the three integrated assessment models and each of the discount rates were run using the same assumptions and scenarios used by the IWG. Each model is run 10,000 times across the random variable space, and the means of the resulting distributions are displayed along with the 95th percentile value as a sensitivity.

**Table C1. 2020 SC-CO<sub>2</sub> with Constant Rate Discounting (2020\$/metric ton CO<sub>2</sub>)**

Model	5%	3%	2.5%	2%	1%	0%
DICE	16	48	72	116	406	2,231
FUND	3	24	42	70	273	1,512
PAGE	26	86	123	190	583	2,875
Average of models	15	53	79	125	421	2,206
95th percentile	45	157	228	350	1,140	5,993

**Table C2. 2020 SC-CH<sub>4</sub> with Constant Rate Discounting (2020\$/metric ton CH<sub>4</sub>)**

Model	5%	3%	2.5%	2%	1%	0%
DICE	560	1,192	1,570	2,201	5,780	25,990
FUND	674	1,593	2,146	3,049	7,698	29,370
PAGE	835	1,821	2,338	3,098	6,256	17,480
Average of models	689	1,535	2,018	2,782	6,578	24,280
95th percentile	1,676	4,019	5,382	7,560	18,910	72,540

**Table C3. 2020 SC-N<sub>2</sub>O with Constant Rate Discounting (2020\$/metric ton N<sub>2</sub>O)**

Model	5%	3%	2.5%	2%	1%	0%
DICE	5,009	16,150	24,450	39,870	140,500	760,900
FUND	4,733	16,310	24,890	40,570	138,600	705,400
PAGE	8,600	25,900	36,490	53,750	143,200	585,200
Average of models	6,114	19,450	28,610	44,730	140,800	683,800
95th percentile	15,500	49,730	72,860	114,700	373,700	1,821,000

## Appendix D. Ramsey-Like Discounting Approach

A key recommendation of the NAS report to improve SCC estimates is to introduce a “Ramsey-like” approach to discounting (NAS 2017). Ramsey discounting is a generalization of the “constant” discount rate approach (discussed above) and is based on a seminal paper by Frank Ramsey (1928). Rather than choosing a single discount rate, a Ramsey-like approach would use a discount rate ( $r$ ) determined by the following formula:

$$r = \delta + \eta \cdot g,$$

where  $\delta$  is the rate of pure time preference (how much society discounts the utility, or human welfare, of people in the future),  $\eta$  is the elasticity of the marginal utility of consumption (how much the value of an incremental dollar of consumption declines as society grows wealthier), and  $g$  is the growth rate of consumption per capita (roughly speaking, the economic growth rate). Both  $\delta$  and  $\eta$  are typically nonnegative, meaning that the discount rate is not simply a constant number but rather depends on the values of those parameters and the rate of economic growth.

Various methods could be used to choose those parameters. The  $\eta$  parameter determines how we discount effects on future generations because they are expected to be wealthier (assuming economic growth is positive). As a result, this value links the discount rate to the economic growth rate. Typical values for  $\eta$  used in the literature are in the range of 1 to 2. The median and mean values of  $\eta$  from the Drupp et al. (2018) survey are 1.00 and 1.35, respectively. RFF economists Richard Newell, Brian Prest, and William Pizer are currently working to estimate values of  $\delta$  and  $\eta$  that reconcile the empirically observed behavior of interest rates, and they plan to use the results from that estimation in future updates to the social cost of carbon dioxide. Their preliminary preferred estimates point to a value of  $\eta = 1.3$ , which is coincidentally very close to the mean of 1.35 reported by Drupp et al. (2018).

The  $\delta$  term, also called the rate of pure time preference, determines how much the utility of people—who may be alive at different points in time—is discounted. Some economists and philosophers believe this rate should be zero, or at least very small. The original Ramsey (1928) paper argued that this kind of discounting is “ethically indefensible,” suggesting a rationale for setting  $\delta = 0$ , although agreement on this is not universal (Arrow 1999). The Stern (2007) review argued for using a very small  $\delta$  value of 0.1 percent, simply to account for the possibility that a future generation might not exist (because, say, an asteroid has struck Earth). The survey results from Drupp et al. (2018) imply a median (mean) value of  $\delta$  of 0.5 percent (1.1 percent) and a modal value of 0 percent. However, they do not find a broad consensus for a near-zero value of  $\delta$ . In RFF’s ongoing work implementing the Ramsey-like framework,  $\delta$  takes on values of 0.4, 1.4, and 3.4 percent (alongside an  $\eta$  value of 1.3) to target near-term target discount rates of 2, 3, and 5 percent respectively.

Given the common argument for considering the possibility of using a zero rate of pure time preference,  $\delta = 0$  could be interpreted as corresponding the CLCPA requirement of considering “a range of appropriate discount rates, including a rate of zero.” The rate of pure time preference is the rate at which society discounts utility, so it may be closer to the underlying ethical intent of the CLCPA in assessing a rate of zero than an overall discount rate that also takes into account the lower value of an additional dollar to wealthier people.

If NYS decided to use a value of  $\delta = 0$  to represent a “rate of zero” for the rate of pure time preference, then the discount rate would simply equal  $r = 0 + \eta \cdot g = \eta \cdot g$ . As previously mentioned, RFF’s preliminary estimate of  $\eta$  is 1.3, alongside an estimated near-term per capita growth rate ( $g$ ) of about 1.3 percent. Using these estimates would imply a near-term discount rate of  $r = \delta + \eta \cdot g = 0\% + 1.3 \cdot 1.3\% = 1.7\%$ , which is close to the 2 percent “low” rate being used by RFF in implementing the NAS recommendations.

## Appendix E. Exchange Rates and Inflation Adjustments

To make comparisons of values more straightforward, estimates are given in 2020 USD (2020\$) amounts. USD inflation was derived from the Federal Reserve Economic Data (FRED) Consumer Price Index page, using January data in each year, found here: <https://fred.stlouisfed.org/series/CPIAUCSL#0>

Exchange rates for GBP and EUR to USD were found on the Federal Reserve Board's Foreign Exchange Rate History data, using January 2 data in each year, found here: <https://www.federalreserve.gov/releases/h10/hist/default.htm>

The following inflators were used:

- 2007USD to 2020USD: 1.2722 (for IWG estimates published in 2016)
- 2018GBP to 2020USD: 1.4143 (for UK traded values)
- 2009GBP to 2020USD: 1.7732 (for UK nontraded values)
- 2018EUR to 2020USD: 1.2349 (for France)
- 2010EUR to 2020USD: 1.7159 (for Ireland)



## Appendix F. UK Schedules for Short-Term Carbon Valuation for Traded and Nontraded Sectors

**Table F1. Traded Price of Carbon for Sectors in EU ETS (2018GBP/metric ton CO<sub>2</sub>e)**

2018GBP per ton CO <sub>2</sub> e			
Year	Low	Central	High
2020	0	13.84	27.69
2021	4.04	20.54	37.04
2022	8.08	27.24	46.4
2023	12.12	33.94	55.75
2024	16.17	40.64	65.11
2025	20.21	47.33	74.46
2026	24.25	54.03	83.82
2027	28.29	60.73	93.17
2028	32.33	67.43	102.53
2029	36.37	74.13	111.88
2030	<i>converges with modeled estimates for non-traded sectors beginning in 2030</i>		

Source: DBEIS (2019).

**Table F2. Traded Price of Carbon for Sectors in EU ETS (2020\$/metric ton CO<sub>2</sub>e)**

2020USD per ton CO <sub>2</sub> e			
Year	Low	Central	High
2020	0.00	19.57	39.16
2021	5.71	29.05	52.38
2022	11.43	38.52	65.62
2023	17.14	48.00	78.85
2024	22.87	57.48	92.08
2025	28.58	66.94	105.31
2026	34.30	76.41	118.54
2027	40.01	85.89	131.77
2028	45.72	95.36	145.00
2029	51.44	104.84	158.23
2030	<i>converges with modeled estimates for non-traded sectors beginning in 2030</i>		

Source: RFF conversion of values in Table F1 to 2020USD as described in Appendix E.

**Table F3. Nontraded Price of Carbon for Non-ETS Sectors (2009GBP/metric ton CO<sub>2</sub>e; DECC 2009)**

2009GBP per ton CO <sub>2</sub> e			
Year	Lower	Central	Upper
2020	30	60	90
2030	35	70	105
2050	100	200	300

Source: Department of Energy and Climate Change (2009).

**Table F4. Nontraded Price of Carbon for Non-ETS Sectors (2020\$/metric ton CO<sub>2</sub>e)**

2020USD per ton CO <sub>2</sub> e			
Year	Lower	Central	Upper
2020	53	106	160
2030	62	124	186
2050	177	355	532

Source: RFF conversion of values in Table F3 to 2020USD as described in Appendix E.

## Appendix G. France's MAC Estimates

**Table G1. France's Shadow Price of Carbon, Proposed to Increase Linearly between 2018 and 2030**

Year	2018EUR/ metric ton CO <sub>2</sub> e	2020\$/metric ton CO <sub>2</sub> e
2018	54	67
2020	87	107
2030	250	309
2040	500	617
2050	775	957

Source: Ministère de la Transition écologique et solidaire 2018. Conversions to 2020USD shown in right column carried out by RFF as described in Appendix E.

## Appendix H. Ireland's MAC Estimates

**Table H1. Ireland's MAC Estimates**

Year	2010EUR/metric ton CO <sub>2</sub> e	2020\$/metric ton CO <sub>2</sub> e
2020	32	55
2030	100	172
2035	128	220
2040	163	280
2045	208	357
2050	265	455

Source: Kevany 2019. Conversions to 2020USD shown in right column carried out by RFF as described in Appendix E.