

September 2, 2025

The Honorable Chris Wright
Secretary
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

**Re: Prime Mover Institute's Comment on the Department of Energy's
Critical Review of Impacts of Greenhouse Gas Emissions on the U.S.
Climate, 90 Fed. Reg. 36,150 (Aug. 1, 2025)
Docket No. DOE-HQ-2025-0207**

Dear Secretary Wright:

The Prime Mover Institute is a public interest organization dedicated to advancing energy dominance in America. We work with coalition partners to engage in rulemaking processes with technical information and legal arguments, calling attention to the impacts regulation has on citizens, the grid, and the rule of law.

America stands at a crossroads. A legacy of bad policy and worse ideas threatens the nation with blackouts and bill hikes, right as demand for energy rises. In order for America to scale up its energy production and avoid the worst-case scenarios, we cannot cling to the policies and procedures that got us here. Fortunately, both policymakers and the private sector realize the need for dramatic change. And courts have begun to look more skeptically at accretions of arbitrary power, accretions that government officials used to thwart energy production and use. This points the way to a future of streamlined regulation, taxpayer savings, and cheaper, more abundant energy for all.

The main obstacle to energy dominance is what Robert Bryce calls the “anti-industry industry,” the non-profits and lawyers dedicated to defending the status quo. These groups have used litigation, regulatory comments, and intimidation to forestall change. They will no doubt keep at it. But, despite their vast funding, they will not be able to maintain a policy regime that's so far out of touch with the American public and their elected representatives. So long, that is, that the advocates of energy dominance show up to defend their ideas.

In the words of Vaclav Smil, “prime movers are energy converters able to produce kinetic (mechanical) energy in forms suitable for human uses.” In the same way, Prime Mover Institute helps convert insight into action.

Thank you for the opportunity to comment.

INTRODUCTION & SUMMARY OF RECOMMENDATIONS

In July 2025, the Department of Energy (DOE) published its report titled *A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate*.¹ A notice of availability of the DOE Critical Review was published in the Federal Register on August 1, 2025, and DOE opened a comment period to request comments on the Critical Review.²

Prime Mover Institute writes to express its appreciation to the DOE for undertaking this important study. The DOE Critical Review represents a crucial opportunity to examine the current consensus on climate change and chart new energy and environmental policies based on what the science actually says.

Prime Mover Institute makes the following recommendations to DOE:

1. Explore making the critical review a Highly Influential Scientific Assessment, or alternatively produce a follow up review of climate science through the HISA process.
2. Regularly issue new evaluations of the state of climate science and of associated outside reports and assessments. The DOE Critical Review could become an important new process of evaluating ideologically biased scientific research with significant implications for U.S. energy policy.
3. Review policies involving climate science across the federal government, and potentially state governments, for scientific validity. Make recommendations for improvement, in line with Executive Order 14303, Restoring Gold Standard Science.
4. Review past official scientific assessments for consistency with Gold Standard Science and the findings of this review, possibly to include prior National Climate Assessments, the Environmental Protection Agency's Framework for Evaluating Damages and Impacts (FrEDI), and the Office of Management and Budget's "Guidance for Assessing Changes in Environmental and Ecosystem Services in Benefit-Cost Analysis."³

¹ Climate Working Group (2025), *A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate*, U.S. DEPARTMENT OF ENERGY, July 23, 2025 (DOE Critical Review).

² 90 Fed. Reg. 36,150 (Aug. 1, 2025).

³ See, e.g., Center for Environmental Accountability, Request for Reconsideration: Technical Documentation for the Framework for Evaluating Damages and Impacts (FrEDI) (June 27, 2025), *available at*

5. Evaluate gaps in the scientific record regarding climate science, climate policy, and the impact of climate policy on the electrical grid and other energy markets. Make suggestions on lines of research, and fund new research where possible, in order to incorporate the best possible evidence and modeling into government policymaking, including into benefit-cost analysis.

COMMENTS OF PRIME MOVER INSTITUTE

1. **The DOE Critical Review provides a needed remedy to the current climate policy debate, which is dominated by extreme viewpoints.**

The DOE Critical Review is a sorely needed contribution to a climate debate that is increasingly dominated by two extreme factions whose views are diametrically opposed to each other. We refer to these as the *Climate Model Catastrophists* and the *Energy Transition Utopians*. The DOE Critical Review provides a vital perspective—that of the realistic center.

Let’s start by addressing the Catastrophists. Prominent experts such as the National Academy of Science President Marcia McNutt still claim that extreme climate models, such as the highly cited RCP 8.5, are “business as usual.”⁴ But RCP 8.5 is already out of sync with the current emissions trajectory.⁵ To take just one of many examples, this scenario assumes an implausible “7-8x increase in coal

<https://www.epa.gov/system/files/documents/2025-07/request-for-correction-25001-technical-documentation-for-the-framework-for-evaluating-damages-and-impacts.pdf>.

⁴ See, e.g., M.E. Wyssession et al., *The Executive Order “Restoring Gold Standard Science” Is Dangerous for America*, AGU ADVANCES, Aug. 20, 2025, <https://doi.org/10.1029/2025AV002011>; Symposium, *Climate Scenarios and Reality*, 38 ISSUES IN SCIENCE AND TECHNOLOGY, iss. 1 (Fall 2021) (symposium discussing Roger Pielke, Jr. & Justin Ritchie, *How Climate Scenarios Lost Touch with Reality*, 37 ISSUES IN SCIENCE AND TECHNOLOGY, iss. 4, at 74–83 (Summer 2021)), <https://issues.org/climate-scenarios-reality-pielke-jr-ritchie-forum>.

⁵ Matthew G Burgess et al., *IPCC Baseline Scenarios Have Over-Projected CO₂ Emissions and Economic Growth*, 21 ENVIRONMENTAL RESEARCH LETTERS 16 (2021), <https://iopscience.iop.org/article/10.1088/1748-9326/abcdd2>.

consumption by 2100, implying the building of >30,000 new coal power plants this century.”⁶

And on the other hand, you have the Utopians, like activist-journalist Bill McKibben. In a new, sunny book, McKibben claims that solar and wind power are “almost too cheap for our economy.”⁷ UN Secretary General António Guterres concurs with McKibben. This July he called the energy transition “not just inevitable—but investable.”⁸ Inevitable because, apparently, renewables are already more economic than fossil fuels. As Guterres claimed, “solar and wind can be deployed faster, cheaper and more flexibly than fossil fuels ever could.”⁹ Solar, indeed, is “now 41% cheaper,” he claimed.¹⁰ No caveats.

To substantiate this bold claim, Guterres cited a report from the International Renewable Energy Agency (IRENA).¹¹ This report relies on the Levelized Costs of Electricity (LCOE). Claims about renewables being cheaper based on LCOE are misleading because they omit firming costs, or the total system cost of integrating new renewable generation. Once you include firming costs, such as the costs of adding battery storage and of keeping natural gas power plants around to serve peak demand, the cost of solar can jump more than threefold. And, worrisome for many advocates of renewable energy, both marginal value and marginal cost deteriorate with increased penetration on the grid.

To make matters worse, Guterres clearly understands that renewables come with additional system costs that are not reflected in the claims he cited.

⁶ Roger Pielke, Jr., *Neither Desirable, nor Possible*, THE HONEST BROKER, Oct. 18, 2023, <https://rogerpielkejr.substack.com/p/neither-desirable-nor-possible>.

⁷ BILL MCKIBBEN, *HERE COMES THE SUN: A LAST CHANCE FOR THE CLIMATE AND A FRESH CHANCE FOR CIVILIZATION* (2025).

⁸ António Guterres, U.N. Secretary-General, *A Moment of Opportunity: Supercharging the Clean Energy Age*, Remarks to the Security Council on Multilateralism and Peaceful Settlement of Disputes (July 22, 2025), <https://www.un.org/sg/en/content/sg/statement/2025-07-22/secretary-generals-remarks-climate-action-moment-of-opportunity-supercharging-the-clean-energy-age-delivered-scroll-down-for-all-french>.

⁹ *Id.*

¹⁰ *Id.*

¹¹ Saied Dardour et al., *Renewable Power Generation Costs in 2024*, INTERNATIONAL RENEWABLE ENERGY AGENCY (2025), https://tecsol.blogs.com/files/irena_tec_rpgc_in_2024_2025.pdf.

In that same July 2025 speech, Guterres highlighted the need to spend more on the systemic costs associated with renewables:

Here's the problem: Investments in the right infrastructure are not keeping up. For every dollar invested in renewable power, just 60 cents go to grids and storage. That ratio should be one to one.

As an energy commentator recently explained:

Guterres did not realize the seriousness of his admission. The acknowledgment that each new solar plant requires a dollar-for-dollar match in grid investment means the capital needed to actually use solar electricity is at least double what proponents claim. ... In reality, while the marginal cost of sunlight is zero, the true system cost of integrating solar into a modern grid includes the heavy and ongoing capital expenditures needed for transmission, stabilization, and balancing services.¹²

In other words, Guterres' claims about solar and wind's relative cheapness seem to be overstated in light of his claims about insufficient spending on the grid and storage.

Much like Guterres, famed activist-journalist Bill McKibben overlooks these economic realities while boosting the supposed cheapness of solar and wind.¹³ Besides firming costs, such renewable advocacy work often fails to consider other complexities: weather variation across time and space, geopolitical risks associated with Chinese-dominated supply chains, or the difficulty of replacing fossil fuels in the production of plastics, steel, fertilizer, and yes even the silicon used in solar panels.¹⁴

The broader point is these two extremes cannot both be correct. If the climate model Catastrophists are right, the energy transition Utopians are wrong. If the extreme RCP 8.5 scenario is a plausible, "business as usual" simulation, an indication of what will happen with no policy changes, it cannot be the case that wind and solar are already cheaper and quicker to deploy than fossil fuels.

¹² *Fessing Up: After Spain, the true cost of solar can no longer be hidden from the public*, DOOMBERG, Aug. 26, 2025. <https://newsletter.doomberg.com/p/fessing-up>.

¹³ Ted Nordhaus, *How Bill McKibben Lost the Plot*, THE NEW ATLANTIS, Aug. 21, 2025, <https://www.thenewatlantis.com/publications/how-bill-mckibben-lost-the-plot>.

¹⁴ *Id.*

And equally, if the Utopians are right, the Catastrophists must be wrong. If it is already the case that “solar and wind can be deployed faster, cheaper and more flexibly than fossil fuels ever could,” as Guterres claimed, then RCP 8.5 should be discarded immediately. No amount of brute force could get the entire world to embark on a massive, rapid 75-year long buildout of coal power plants, if electricity can already be supplied more reliably and cheaply from the wind and sun. Indeed, if the renewable Utopians are right, then even more moderate emissions than RCP 8.5 scenarios may already be implausible.

Strangely, however, the climate model Catastrophists and energy transition Utopians rarely confront each other. At least not publicly. In fact, the implicit contradiction between their two paradigms is seldom noted. This is especially strange because their necessary incompatibility is apparent with even a moment’s reflection. Instead, both extremes of the climate debate direct their ire towards a third group, one whose positions lie apparently between them: the realistic center.

The realistic center recognizes that the emissions pathways envisioned in RCP 8.5 and similar models are implausible and also acknowledges that a rapid or immediate transition away from fossil fuels is impractical.

Moreover, the realistic center is also distinguished by its humility about what is knowable today. Whereas the extremes confidently proclaim their views on future emissions pathways, the impact of climate change on specific extreme weather events, and economic trends, the realistic center usually hesitates to make firm declarations regarding what it recognizes to be complex, long-term phenomena.

2. Catastrophists and Utopians have taken U.S. climate and energy policy off course.

That brings us back to the DOE Critical Review, a paragon of the realistic center. Chapter 3 rightly notes that “Widespread use of RCP8.5 as a no-policy baseline has created a bias towards alarm in the climate impacts literature.”¹⁵ As of Ritchie and Pielke Jr.’s 2020 publication, “16,800 scientific papers published between 2010 and 2020 used the RCP8.5 scenario, with about 4,500 of the articles linking RCP 8.5 to the concept of “business-as-usual.”¹⁶

Indeed, an active, publicly available ensemble of RCP 8.5 simulations notes that RCP 8.5 “is frequently referred to as the ‘business as usual’ scenario.”¹⁷ This

¹⁵ DOE Critical Review, at 15.

¹⁶ *Id.*

¹⁷ Frederic Castruccio et al., *MESACLIP: A 10-member ensemble of CESM HR RCP 8.5 (2006-2100) simulations*, RESEARCH DATA ARCHIVE AT THE NATIONAL

ensemble is compiled by “scientists at Texas A&M University (TAMU) and the U.S. National Science Foundation National Center for Atmospheric Research (NSF NCAR).” These are no fringe climatologists. (As a side note, readers will do well to follow the money on RCP 8.5 and “business as usual”—search for “risky business”).

The debate over emissions scenarios is not just an academic exercise. Unrealistic emissions scenarios continue to justify high-impact policy decisions. For example, the Network for Greening the Financial System (NGFS) is a “forum for the world’s central banks and other regulators to agree on a common set of climate risk principles ... and also a workstream to develop a common climate toolkit that can be used for bank supervision of the climate risks of banks.”¹⁸ Over 100 central banks belong to the NGFS.

The US Federal Reserve joined the NGFS in 2020. Other US agencies are or have been members of the NGFS, including the Office of the Comptroller of the Currency (OCC), the Federal Housing Finance Agency (FHFA), the Federal Deposit Insurance Corporation (FDIC), and the Federal Insurance Office, within the Treasury Department.¹⁹

Here is not the place for a full accounting of the impact of the NGFS on US policy, but it is worth mentioning that the Federal Reserve relied upon NGFS extensively in the recent “Pilot Climate Scenario Analysis” exercise that it imposed upon major banks.²⁰

So, how is the NGFS informing financial regulators and central banks around the world? Are its insights credible? One bad sign is that NGFS built its climate

CENTER FOR ATMOSPHERIC RESEARCH, COMPUTATIONAL AND INFORMATION SYSTEMS LABORATORY (2024), <https://doi.org/10.5065/PNCR-5S34>.

¹⁸ Roger Pielke, Jr., *Too Big to Fail*, THE HONEST BROKER, Aug. 15, 2025, <https://rogerpielkejr.substack.com/p/too-big-to-fail>.

¹⁹ Press Release, Board of Governors of the Federal Reserve System, Federal Reserve Board announces it has formally joined the Network of Central Banks and Supervisors for Greening the Financial System, or NGFS, as a member (Dec. 15, 2020), <https://www.federalreserve.gov/newsevents/pressreleases/bcreg20201215a.htm>.

²⁰ *Pilot Climate Scenario Analysis Exercise: Summary of Participants’ Risk-Management Practices and Estimates*, BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM, May 2024, <https://www.federalreserve.gov/publications/2024-may-pilot-climate-scenario-analysis.htm>.

damage functions using thoroughly debunked research.²¹ This research relied upon RCP 8.5, as well as inaccurate data from Uzbekistan. According to Jessica Weinkle, “Nature is clearly aware of the problems in the reliability of the methods and data of the paper but is reluctant to issue a retraction. Instead, Nature has maintained a user warning on the paper for over a year while awaiting ‘appropriate editorial action.’”²² This behavior is troubling from a major scientific journal, but Weinkle’s digging into the financial conflicts of interest at play suggests an explanation.

The European Central Bank (ECB) recently warned Credit Agricole, France’s second largest lender, of a potential €7 million fine, over its alleged failure to manage climate risk.²³ According to Weinkle, “News focused on ECB’s attention to impacts of extreme weather on physical assets indicating NGFS damage fx (function) as a core matter.”²⁴ This is bad science translated into bad policy, causing economic harm.

Given past and apparently ongoing U.S. Government cooperation with NGFS,²⁵ and the faulty scientific underpinnings of NGFS’ models, this raises a discomfoting specter, that current U.S. government policy is also influenced by inaccurate climate models. One opportunity for further DOE review of climate science is to examine the extent to which NGFS’s flawed models of damages from climate change have influenced U.S. policy. Another would be to review the extent to which U.S. government agencies continue to rely upon flawed models of economic and other impacts of climate change, more broadly.

²¹ Roger Pielke, Jr., *Too Big to Fail*, THE HONEST BROKER, Aug. 15, 2025, <https://rogerpielkejr.substack.com/p/too-big-to-fail>.

²² Jessica Weinkle, *A Climate-Related Financial Risk Boondoggle: Bad Methods and Conflicts of Interest in the Attempt to “Green” Finance*, THE ECOMODERNIST, Aug. 22, 2025, <https://www.breakthroughjournal.org/p/a-climate-related-financial-risk>.

²³ Alastair Marsh et al., *ECB Said to Warn Agricole of Possible Fine over Climate*, BLOOMBERG, July 21, 2025. <https://www.bloomberg.com/news/articles/2025-07-21/ecb-said-to-warn-credit-agricole-of-possible-fine-over-climate>.

²⁴ Jessica Weinkle (@JessicaWeinkle), X (Aug. 25, 2025, at 11:22 E.T), <https://x.com/JessicaWeinkle/status/1959999935224348847>.

²⁵ Network for Greening the Financial System, Membership, <https://www.ngfs.net/en/about-us/membership>.

3. DOE should consider several opportunities to strengthen its Critical Review.

3.1. DOE should report on the ways climate extremism has been a driver for costly, inefficient energy policies.

While it does evaluate the economic impact of climate change, DOE's critical review does not address the cost of specific energy transition policies. Nor does it ask specifically whether these technologies are already cheaper than a fossil-fueled alternative. Some of these costs have been addressed, albeit imperfectly, by the Environmental Protection Agency's deregulatory proposals for motor vehicles and power plants.²⁶

But DOE's fair-minded reckoning of the science is a crucial corrective to our current debates. Consider the divergent implications of the Catastrophists and Utopians' assumptions. The Catastrophists' climate models appear to justify extraordinarily expensive policies to subsidize renewables and ban fossil fuels, but they do so only by implicitly denying the claims of the Utopians. If the Utopians are correct, all of the federal energy policies pushed by Catastrophists are a waste of taxpayer dollars, incentivizing what will happen anyway.

Why spend trillions on technology that is supposedly already much cheaper and faster to deploy, especially as U.S. debt approaches unprecedented levels?²⁷ If we assume the energy transition Utopians' predictions are correct, then we should not take seriously RCP 8.5, or any other climate models that foretell high, continued fossil fuel usage throughout the 21st century. And even if it did make sense to spend trillions of taxpayer dollars to accelerate the supposedly inevitable, would it make sense to impose such costs on Americans specifically, since the nation accounts for only about 11% of world greenhouse gas emissions?²⁸ And since

²⁶ Issac Orr & Mitch Rolling, *Reverse Uno: Calculating the Savings from Trump's Repeal of Biden's Greenhouse Gas Regulations on Power Plants*, ENERGY BAD BOYS, Aug. 23, 2025, <https://energybadboys.substack.com/p/reverse-uno-calculating-the-savings>.

²⁷ Travis Fisher & Joshua Loucks, *The Budgetary Cost of the Inflation Reduction Act's Energy Subsidies: IRA Energy Tax Credits Could Cost \$4.7 Trillion by 2050*, CATO INSTITUTE (Policy Analysis No. 992), March 11, 2025, <https://www.cato.org/sites/cato.org/files/2025-03/Policy-Analysis-992-new.pdf>; *An August 2025 Budget Baseline*, COMMITTEE FOR A RESPONSIBLE FEDERAL BUDGET, Aug. 20, 2025, <https://www.crfb.org/blogs/august-2025-budget-baseline>.

²⁸ M. Crippa et al, *GHG Emissions of all World Countries*, PUBLICATIONS OFFICE OF THE EUROPEAN UNION, 2023, <https://doi.org/10.2760/953322>.

its emissions peaked in 2005 and have declined significantly since.

These obvious tensions suggest that the DOE might consider probing deeper into the consistency between climate models and the economic impact of climate policies. The DOE's findings in climate models will have implications for the costs and benefits of climate policies, and of their potential repeal, across the government.

3.2. DOE should critique the “Social Cost of Carbon”—and how it has been used to justify ineffective and inefficient policies.

A primary justification for imposing such harmful policies on American citizens is the Social Cost of Carbon (SCC), which the critical review addresses in Chapter 11.²⁹ The SCC purports to quantify the benefits of climate action in dollar terms. The critical review, though, concludes that “Social Cost of Carbon estimates, which attempt to quantify the economic damage of CO₂ emissions, are highly sensitive to their underlying assumptions and so provide limited independent information.”³⁰

The authors would do well to note who has come around, albeit belatedly, to this same conclusion: climate economist Noah Kaufman. Remarkably, Kaufman, served as a senior economist in the Biden Council of Economic Advisers. In that capacity, Kaufman was involved in the Biden administration's use of the Social Cost of Carbon to justify its policies. And yet, Kaufman has reached the same conclusion as the Critical Review, noting that “SCC models can spit out virtually any number by replacing one reasonable assumption with another. That means politicians or judges can justify virtually any decision by tweaking the assumptions of these models.”³¹

It is absurd to calculate a Social Cost of Carbon even for costs supposedly borne over the next decades, and this absurdity is magnified by extending the time window further. Some usages of the SCC project costs out as far as 2300.³²

²⁹ DOE Critical Review, at 116–25.

³⁰ *Id.*

³¹ Noah Kaufman, *The Social Cost of Carbon Is Gone—and That May Be Good News for Future US Climate Policy*, CENTER ON GLOBAL ENERGY POLICY AT COLUMBIA SIPA, July 23, 2025.

³² U.S. Environmental Protection Agency, Regulatory Impact Analysis of the Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review,” (Dec. 2023), <https://www.epa.gov/system/files/documents/2023->

Michael Crichton once observed that, “to predict anything about the world a hundred years from now is simply absurd.”³³ Surely that holds a fortiori for two hundred and seventy-five years from now.

4. The DOE Critical Review restores common sense to the climate and energy policy debate.

The Kaufman case illustrates another striking aspect of the climate debate. The Overton window of discourse on the climate is vigorously enforced by both Catastrophists and Utopians. Public figures pay high personal costs for stepping outside the lines. Were anyone with less sterling progressive credentials to make similar points as Kaufman, he surely would be labeled a climate denier, or worse. Consider that climate activists shut down the speeches of progressive commentator Matthew Yglesias for arguing that America should not ban fracking. In this case, Yglesias was defending the statements of former Vice President Kamala Harris.

It is worth noting that most Americans don’t buy extreme narratives on the climate, and this is evidenced by the fact that climate policy that costs money is politically unpopular. A majority of Americans would refuse to pay even \$1 a month to fight climate change, according to a 2024 University of Chicago poll.³⁴ This suggests most Americans would oppose every single climate policy, from the endangerment finding and consequent regulation of both power plants and motor vehicles, to wind and solar tax credits, to renewable portfolio standards. Were it explained to them in dollars and cents, and plain English, that is.

The DOE Critical Review paves the way for restoring balance to discussions about climate and energy policy. These discussions have too often been plagued by religious devotion to an incoherent creed. This creed combines the Catastrophist’s defense of extreme climate scenarios with the Utopians’ smug confidence that renewables are already generally cheaper and faster than fossil fuels. It claims to defend democracy and the public interest, while promoting unpopular, expensive

12/eo12866_oil-and-gas-nsps-eg-climate-review-2060-av16-ria-20231130.pdf; Travis Fisher, *The Political Economy of EPA’s Updated Social Cost of Carbon*, CATO INSTITUTE, Feb. 28, 2024, <https://www.cato.org/blog/political-economy-epas-updated-social-cost-carbon>.

³³ Michael Crichton, Remarks at the Caltech Michelin Lecture (Jan. 17, 2003), *available at* <https://www.aei.org/articles/transcript-global-warming-is-all-guesses>.

³⁴ 2024 Poll: Americans’ Views on Climate Change and Policy in 12 Charts, ENERGY POLICY INSTITUTE, June 2024, <https://epic.uchicago.edu/insights/2024-poll-americans-views-on-climate-change-and-policy-in-12-charts>.

policies through undemocratic means. While claiming the mantle of progressivism, its policies too often end up harming the poor and benefiting the rich.³⁵

Climate extremism is plagued by numerous such self-contradictions—evidence of a lack of scrutiny and open debate. These errors of reasoning also point to deeper issues with a lack of curiosity about scientific developments, closed-mindedness to paradigm-shifting ideas, and an unwillingness to set aside bias in pursuit of the truth. It is no surprise, therefore, that a critical review of the science finds much of the climate movement’s claims to be out-of-step with scientific evidence.

CONCLUSION

The DOE Critical Review is a welcome contribution to the stifled debate on climate change. It paves the way for a reconsideration of the use of climate science across the federal government.

Prime Mover Institute commends Secretary Wright for his leadership on this important issue and hopes that this Critical Review is just the beginning of a new approach to climate science and its impact on U.S. policy.

Respectfully submitted,

/Russell Greene/
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³⁵ Hernandez, Jennifer, *Climate Reactionaries: Green activists defend policies that disproportionately harm the poor*, CITY JOURNAL (Summer 2024).
<https://www.city-journal.org/article/climate-reactionaries>.