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| REVIEWER INFORMATION | |
| **Name of Organization** |  |
| **Name of Reviewer** |  |
| **Email Address** |  |
| To maintain transparency in the Standard Development Process, WRI and WBCSD aim to publish survey comments on the GHG Protocol website. Do you give WRI and WBCSD permission to publish your comments? |  |

**Reviewers**: please provide your contact details below, comments on the Key Questions, and use the subsequent Overall Review template to provide comments on any other parts of the Guidance. Please send to [Mary.Sotos@wri.org](mailto:Mary.Sotos@wri.org) by Monday, April 21st.

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| KEY QUESTIONS FOR REVIEWERS | | | |
| **Chapter** | **Sub-section** | **Outstanding Questions** | **Comments** |
| Ch. 5 | 5.4.4.2 | **Certificate sales:** Companies selling certificates from self-generation forfeit the ability to make certain claims about the generated and consumed energy. However, stakeholders have noted that companies in this situation should still be able to describe their role in providing energy generation services. Should this Guidance provide any recommendations on how companies can narratively document this scenario for readers of their inventory? If so, what could this include given national rules regarding consumer-facing claims? |  |
| Ch. 5 | 5.4.4 | **Net Metering:** Companies selling self-generated power to the grid may get credit from their supplier via net metering rules. This may leave the reporting company with “activity data” on electricity use that only shows *net* consumption rather than total consumption (self-generated + grid purchased). The Guidance currently allows a net consumption figure to be used based on practicality. Should other means of activity data gathering and subsequent emissions calculation be included? |  |
| Ch. 5 | 5.4.4 | **Distributed Generation case study:** This Guidance requires avoided emissions to be reported separately from the scopes, but this can disadvantage companies buying power from low (but not zero) carbon distributed generation facilities that may avoid the need for marginal unit dispatch, but which still entail reporting either scope 1 or 2 emissions (depending on the ownership structure). This can be acute where margin marginal rates are high but baseload and average rates are low, making a company’s scope 1 or 2 increase while emissions at a system-level are decreased. Some stakeholders have recommended the Guidance provide a means for DG consumers to more formally take credit for these estimated avoided emissions, consistent with recommendations of other some other reporting programs. Should the Guidance provide additional discussion or recommendations for this common scenario? |  |
| Ch. 6 | 6.1 | **Background:** Is this background context useful, or redundant with common knowledge on this topic? |  |
| Ch. 6 | 6.4 | **Driving new low-carbon energy generation:** This Guidance treats market-based accounting as an allocation procedure, and provides several pathways by which corporate procurement can drive new low-carbon energy development. It does not, however, require contractual instruments to meet offset-based additionality tests. Is the Guidance’s explanation for this clear? What else, if anything, should be added to this part of the Guidance? |  |
| Ch. 9 | 9.1 | **Balancing Emissions:** Stakeholders have noted that the market-based method for scope 2 accounting, by definition, does not reflect the wider set of grid stability needs that often necessitate dispatchable fossil fuel resources to complement intermittent renewable sources. This is noted in the description of both methods, but show the Guidance provide further discussion on this? |  |
| Ch. 9 | 9.3 | **Issuing Bodies:** Should the market-based method specify which types of entities can confer, authorize or codify that an instrument conveys a GHG emission rate claim? Or is it sufficient to state that the claims are not double counted, but that any independent entity (e.g. not the party generating the instrument nor the party making the GHG claim through retirement of the instrument) may issue certificates? |  |
| Ch. 9 | 9.3 | **Criteria 1. Conveying GHG emission rate claims**. Currently, the Guidance states that “*Certificates that do not currently specify what, if any, energy attribute claims are conveyed, may still convey a claim implicitly through proving the second point: that no consumer is claiming the same energy generation attributes. Evidence of this may be achieved through attestations from each owner in the chain of custody.”* Does this provision still ensure sufficient standardization and rigor? |  |
| Ch. 9 | 9.3 | **Validating Quality Criteria:** The draft Guidance requires reporters to provide a “*Third party statement on fulfillment of Quality Criteria, or through the of certification program issuing the certificates.”*  Should other reliable means of demonstrating fulfilment of Quality Criteria be accepted (e.g. internal attestations)? |  |
| Ch. 9 | 9.3 | **Market Boundaries:** Should this Guidance provide additional information for companies navigating the market boundaries for production and use of certificates? |  |
| Ch. 9 | 9.4 | **Product Features:** These Product Features represent the qualities vary most across programs, and that interest stakeholders. What additional guidance, or other features, should be included to make product feature disclosure relevant? |  |
| Ch. 11 | --------- | What additional guidance can be provided about how to report scope totals and additional information? |  |
| General |  | Is the structure of the Guidance easy to follow and understand? Were you able to find the information you needed easily? |  |

OVERALL REVIEW

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| **Chapter** | **Line number** | **Sub-section/ Figure/ Table/** | **Type of comment:** *general, technical, editorial* | **Comments** | **Proposed change** |
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