

November 13, 2025

Dear Misti Groves (CEBA),

Thank you for reaching out to GHG Protocol regarding voluntary corporate energy buyer representation in the Scope 2 TWG via our website form for concerns and complaints. Following the evaluation criteria of GHG Protocol's *Concerns and Complaints Procedure*, we classified your submission as a complaint. In line with our due process, the topic was brought to the respective subcommittee of our Independent Standards Board (ISB) for review.

GHG Protocol always welcomes Stakeholders' feedback and criticism. Transparency and inclusion are hallmark principles of any robust multi-stakeholder process, and an inclusive process is key for credibility and broad acceptance of standards developed.

The selection of GHG Protocol TWG members as described in section 4 of the TWG ToR is based on a best-practice approach. Following an open call with over 1,300 respondents, and governed by the respective Terms of Reference (ToR), the selection process considers multiple criteria to ensure depth of subject matter expertise, diverse perspectives, and balanced representation across organization types (academia, NGOs, businesses), industry sectors (including large electricity consumers and utilities), and geographies. Based on these criteria, following our due process, the ISB then approves the TWG composition. As a reminder, TWG members serve in their personal capacity, independent of employment or affiliation.

On this basis, we believe that the views of energy buyers are sufficiently represented within the Scope 2 TWG, particularly when considering members' prior experience and those with roles supporting buyers. The ISB also includes major buyer perspectives (e.g. from global manufacturers).

In this sense, we do not believe that having additional members would have substantially changed the outcomes prior to public consultation provided that relevant views were shared and considered against the established Decision-Making Criteria.

The ISB is aware that multiple alternative positions were considered by the TWG and evaluated against the Decision-Making Criteria, which is noted in the TWG minutes, and incorporated into the public consultation materials. The public consultation for Scope 2 that was launched October 20, 2025 is open for all stakeholders. We trust that CEBA will encourage its members to participate and share their feedback, including any additional perspectives they believe would be important.

We thank you for your productive suggestions of the need for enhanced engagement with energy buyers and pilot testing of methodologies. We take them seriously, and these matters will be discussed with the Secretariat and a determination made by the full ISB on whether they are ultimately pursued according to the *Standard Development and Revision Procedure*.

We hope these clarifications have assisted your understanding of our due process. We look forward to receiving your contributions to Scope 2 public consultation, and to further constructive work amongst the TWG members following the consultation's closing. Please don't hesitate to reach out to us if you have any further questions.

Kind regards,

Prof. Dr. Alexander Bassen, Chair of the Independent Standards Board

Name:

Misti Groves

Date Submitted:

Sep 23, 2025

What is your organization?:

Clean Energy Buyers Association

Description of complaint or concern.:

Complaint: The perspective of voluntary corporate energy buyers is underrepresented
Description: We respectfully submit a complaint under the GHG Protocol Complaints and Concerns Procedure 2.2.1 i ("inadequate stakeholder engagement") related to the composition of the Scope 2 Technical Working Group (TWG) and the engagement of the GHG Protocol with energy buyers. The Standard Development and Revision Procedure states under 4.2.1 that "care shall be taken to ensure as balanced a stakeholder group as possible has been engaged for TWG participation". By our count, the membership of the Scope 2 Technical Working Group has fluctuated between approximately 39 and 45 members between March and September 2025. Of these members, TWG members representing organizations engaging in voluntary corporate clean energy procurement amounted to only about five to eight, depending on the month. By our count, these have consisted of Avi Allison, Devon Swezey, Hannah Hunt, Henrik Sundberg, Holly Lahd, Kelly Lichter, Priya Barua, Sophia Wang, and Zoe Godijn. In other words, energy buyers generally accounted for less than 20% of the TWG. Given that the impact of the Scope 2 Guidance on global decarbonization to date has primarily been the impact of voluntary corporate procurement and given that energy buyers will be the main users of the revised Scope 2 Guidance, we do not consider the TWG participation to date a balanced stakeholder group. CEBA has raised the resulting feasibility (and, consequently, impact) concerns of many of our energy buyer members in our public letter to the ISB on May 23, 2025, and called on the ISB to increase and enhance engagement with energy buyers. We are concerned that to our knowledge, as of the writing of this complaint, no substantial engagement has taken place yet between members of the ISB and energy buyers to discuss the feasibility concerns we raised. We also note that according to the published meeting presentation of the TWG's July 28 meeting, the ISB referenced remaining unresolved feasibility barriers and suggested using targeted consultation to "ensure geographic, SME, and industry-specific perspectives are fully represented". We strongly support such consultations but have not received an opportunity to engage in them and are not aware of such consultations having taken place with other industry bodies or even individual companies. Proposed corrective action: The Protocol should increase and enhance buyer engagement in the revision process. Technical Working Groups should have appropriate buyer representation. The Protocol should more strategically engage with diverse buyers and buyer associations/groups to test key revision details. The Protocol should consider pilot programs to test key proposed revisions.

Which workstream does this involve:

Scope 2

Could you clarify which part of the process you're encountering challenges with?:

Secretariat

Independent Standards Board