November 13, 2025

Dear Misti Groves (CEBA)

Thank you for reaching out to GHG Protocol regarding public documentation of the TWG vote held on June 25, 2025 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. Transparency is a hallmark principle of any robust multi-stakeholder process and critical for stakeholder trust in our standards revision process.
Your complaint contains two suggestions, and we appreciate the constructive spirit in which they are offered: 1) that GHG Protocol publish additional meeting documentation containing anonymized TWG member comments included with their votes, and 2) that GHG Protocol publish the ten alternate proposals and include them in the available Scope 2 public consultation materials.

Regarding your first suggestion, an indicative vote response summary was previously provided to all TWG members following their vote and to the ISB for consideration in advance of its vote on Scope 2 in July. We will request that the Secretariat also make this information publicly available in the Greenhouse Gas Protocol document repository.

Regarding your second suggestion, there were many ideas discussed by the TWG throughout the standards update process which ultimately did not receive sufficient support for further development. These Alternate Positions were appropriately catalogued by the Secretariat for reference by the TWG and ISB members, and importantly, they never advanced to fully-fledged proposals. To keep the amount of information manageable for stakeholders, not all interim or draft content is made publicly available, particularly when that content does not have sufficient support within the TWG for further development

The Secretariat has publicly posted summaries of the ten alternate positions, and TWG members were given the chance to provide edits on the summaries. Further, the Scope 2 public consultation published on October 20, 2025, reflects the engagement and feedback of the ISB on those topics nd includes many questions which touch on the ideas presented in the alternate positions. Accordingly, we do not believe there is a need to amend the consultation materials at this time.

We hope that these clarifications have assisted your understanding of our due process, and we further hope that you will encourage the CEBA membership to participate in the Scope 2 public consultation. 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 22, 2025

What is your organization?:

Clean Energy Buyers Association

Description of complaint or concern.:

We respectfully submit a complaint under the GHG Protocol Complaints and Concerns Procedure 2.2.1 iii ("Non-transparent decision-making, including lacking documentation of decision") related to the lacking public documentation of the TWG vote held on June 25, 2025 on the proposed revisions. Specifically, TWG members submitted comments along with their votes, and developed Alternate Proposals. CEBA asks the GHG Protocol to make both publicly available. We note that when the members of the TWG voted on the proposed Scope 2 Guidance revisions on June 25, 2025, they may have qualified their votes with comments accompanying their votes. However, the meeting minutes and meeting presentation of that TWG meeting only reflect the votes, not the comments. We also note that for these votes, 21 of 43 cast votes "fully supported" hourly matching (Question 6) and 16 of 42 cast votes "fully supported" proposed methodologies for demonstrating deliverability (Question 7B); the remainder of the votes either "supported with concerns", were neutral, or opposed the two revisions. Anticipating the lack of consensus for the discussed proposal, the Secretariat accepted Alternate Proposals developed by the TWG members. TWG members put forward ten such alternate proposals, several of which were co-signed by multiple TWG members. The GHG Protocol published a brief one-page summary for each of the ten alternate proposals (pages 31-41 of the meeting presentation of the June 4 TWG meeting, available at this link). However, the actual language of the alternate proposals is not available to the public. We think it important to let the public see the extent and nature of different underlying perspectives behind the TWG vote results. We refer to two relevant articles in the Technical Working Group Terms of Reference: Technical Working Group Terms of Reference 5.5.4 states that "All meeting minutes as well as any relevant materials shall be made publicly available on the GHG Protocol website". Technical Working Group Terms of Reference 6.2.4 states that "The Secretariat shall keep track of any indicative vote and its outcome, including the extent and nature of different underlying perspectives, and shall provide a detailed breakdown of number of voting members, votes for and against as well as abstentions alongside additional relevant considerations to the ISB." It is our view that 6.2.4 applies to both the comments that the TWG members submitted alongside their votes and the Alternate Proposals. Proposed corrective action: Publish an appendix to the June 25 meeting documentation that shares the anonymized comments that the TWG members included with their votes, grouped by the respective questions and votes. Include the TWG votes and notes in the materials that the GHG Protocol will make available for the public consultation. Publish the

ten Alternate Proposals and include them in the materials that the GHG Protocol will make available for the public consultation.

Which workstream does this involve:

Scope 2

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

Secretariat