

May 22, 2026

Dear Emissions First Partnership,

Thank you for reaching out regarding the deadline of the Actions and Market Instruments Request for Information deadline via our website form for concerns and complaints.

We are pleased to inform you that the deadline for submissions to the **Actions and Market Instruments (AMI) Request for Information (RFI)** has been extended from **31 May** to **15 June** (11:59 pm PT). This extension is intended to provide stakeholders worldwide with additional time to review the materials, consult internally where needed, and prepare considered feedback.

Being mindful of timelines in the development process that have to be kept, we consider this extension sufficient. Please also note that the AMI RFI is an early-stage request for feedback, to be followed by a formal public consultation on a draft AMI Standard in 2027 which provides stakeholders another opportunity to engage.

We appreciate the interest and engagement of stakeholders throughout this process and encourage all interested parties to submit their feedback by the extended deadline.

Best regards,

David Burns, Director of Governance, GHG Protocol

Extend AMI RFI to 90 days (July 1st, 2026)

The Emissions First Partnership is a coalition of 32 organizations, including buyers, developers and NGOs responsible for more than 50GW of combined clean energy procured globally since 2008.

As a coalition dedicated, first and foremost, to maximizing the impact of clean energy purchases to accelerate decarbonization, we are very pleased to see the focus on impact accounting and multi-statement disclosures developing through the AMI Technical Working Group.

We look forward to responding to the AMI RFI Survey and are aware of many other companies who want to give thoughtful responses. The 60-day calendar duration of the comment period, however, poses a challenge for subject matter experts at companies to secure internal sign-offs from management in time and to appropriately educate teams on the new AMI procedure. Unlike Scope 2 location- and market-based accounting, in which sustainability teams have spent years building internal understanding, aligning executive leadership, and developing momentum, the AMI consultation introduces a broad set of new and complex topics. These require substantial internal education and coordination before informed responses can be developed. Therefore, we respectfully submit a complaint based on the GHG Protocol Complaints and Concerns Procedure 2.2.1 (“failure to conduct required public consultations”) related to the insufficient duration of the 60-day response period.

We agree with the GHG Protocol that public consultation is a “critical component of the GHG Protocol’s Standard Development and Revision procedure.” The 60-day calendar duration of the public consultation is inadequate to provide a meaningful “opportunity for all stakeholders to contribute feedback on key topics related to the GHG Protocol standards and guidance” and threatens the integrity of the revision process.

The 60-day period is inadequate for the following reasons:

1. The May 31st deadline to respond to the AMI RFI Survey is, to our knowledge, the only opportunity for input until the formal public consultation of the draft standard in Q3 2027, so we want to ensure we deliver thoughtful insights during this round of feedback.
2. Although leaders are familiar with Scopes 1, 2, and 3 after years of education and engagement, the concept of AMI is newer to many senior leaders (e.g. an Impact Statement), so there is an education period required before companies can drive alignment and secure internal approvals. Additionally, the concepts proposed in the RFI cut across various climate and sustainability actions that require companies to build internal consensus through adequate consultation internally and sectorally.
3. We are also aware of several competing priorities (for example, CARB responses are due June 1 as well as public comments on a [Proposed CCS EAC Methodology](#) are due June 5) and internal corporate teams who would like to respond are stretched thin.

Proposed corrective action: For the reasons outlined above, extend the duration of the RFI period an additional 30 days so that it drives significantly more responses and gives AMI more effective inputs.

We sincerely appreciate your consideration and look forward to contributing thoughtful input on this important RFI.

The Emissions First Partnership

We have received comparable complaints from the individuals listed below and have issued substantively aligned responses. In line with GHG Protocol's [Complaints and Concerns Procedure](#), we evaluate each complaint according to established criteria and respond in a consistent and transparent way.

Name	Organization	Complaint Received	Response Sent
Jeffrey Gorham	ACORE	4/29/2026	5/22/2026
Patrick Falwell	Green Strategies	5/6/2026	5/22/2026
Emissions First Partnership	Emissions First Partnership	5/6/2026	5/22/2026
Misti Groves	CEBA	5/6/2026	5/22/2026
Trevor Merrifield	U.S. Chamber of Commerce	5/6/2026	5/22/2026
John Powers	Schneider Electric	5/7/2026	5/22/2026
Jason Beck	Zettawatts	5/7/2026	5/22/2026
Mel Shank	Patagonia, Inc.	5/7/2026	5/22/2026
Hollie Mitchell	Steel Dynamics, Inc.	5/8/2026	5/22/2026
Confidential	Confidential	5/8/2026	5/22/2026
Chandni Sinha Das	WattTime	5/11/2026	5/22/2026