

ICLEI USA

Community Protocol Reviewers Comment Form

Instructions

In order to streamline the process of collating and addressing suggested changes to the draft Community Protocol, please use this form for your comments. For each comment, please indicate the Chapter number (e.g, 1.3), the line #, and/or the Table or Figure # to which your comment refers.

A draft of the Community Protocol was released for public comment on July 9, 2012. All feedback is due on or before 5:00 pm (EDT) on Monday, July 30, 2012. Please send your Comment Forms to iclei-usa@iclei.org.

ICLEI USA would also like your feedback on the draft Community Protocol both through an **online survey**. Please answer a short series of questions in a Survey Monkey survey that can be found here → <http://www.surveymonkey.com/s/PFZGTCX>. The survey will be available until 5:00 pm (EDT) on Monday July 30, 2012.

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General Comments (please write your comments below and feel free to submit additional pages of general comments).

In general, we feel that without additional clarification, this Protocol may create potential for significant double counting, particularly if community members are also reporting emissions through a voluntary GHG reporting inventory/mechanism. We interpret the application of this Protocol to be the creation of a “community profile” of GHG emissions, as opposed to, for example, an accurate aggregation of the emissions of individual community members, since the Protocol does not appear to involve accessing individual reports from within the community, but rather involves making new community-wide estimates. In this case, it serves a different function than other GHG reports: no claims of ownership of these emissions are being made necessarily; rather the Protocol’s purpose is merely to estimate and track emissions year to year in order to inform policy. The Protocol and community emissions totals should therefore not be used by individual community members to extrapolate or determine their own emissions, and individual community members’ emissions are not necessarily calculated by the methods contained therein. It is very important to make this explicit in order to avoid double counting. We recommend that you include this as a caveat somewhere in the introduction to the Protocol.

Also, it is important that the Protocol properly account for renewable electricity (including RECs) and offsets that have been sold off from projects within the community boundary to external buyers, in which case the emissions benefits of these projects have been transferred outside the community. This applies to the reporting requirements for several emissions sources and activities covered in the Protocol.

Chapter 2. Inventory Reporting Guidance			
Section#	Line#	Table or Fig #	Comment
2.5.1	577-579		What you describe as potential double counting here would appear not to be since the “GHG emissions associated with electricity used in the community” (scope 2) and “the actual GHG emissions produced at the power plant” (scope 1) fall into different scopes, unless you mean it would be double counting if they were to combine these two within the same scope. Please clarify.

Appendix C: Built Environment Emission Activities and Sources			
Section #	Line#	Table or Fig #	Comment
BE.2	470		This chapter should include some description of renewable energy certificates (RECs), voluntary green power purchasing, and contract-specific purchasing. Please see the joint EPA, CRS, WRI, and NREL paper <i>Guide to Purchasing Green Power</i> , available online here: http://www.epa.gov/greenpower/documents/purchasing_guide_for_web.pdf . It may be the case that communities are purchasing electricity from specified sources for municipal buildings, etc.
BE.2	500-504		We find these sentences to be very unclear. Does this mean that you are considering all electricity emissions to be scope 2 because you are accounting for scope 1 emissions from electric power produced within the community separately? Please clarify.
BE.2	512-513		We find the use of the term “clean power purchases” here to be unclear and in need for further description and explanation. What are the clean power purchasing options allowable under this Protocol? RECs are the means by which all renewable electricity purchasing options in the US are attributed, so without further clarification of viable renewable energy options and RECs, this reference to “clean power purchases” does not provide the reader with useful information. Please see comments below and clarify.
BE.2	514		Please consider a (very likely) scenario(s) in which there is not only one utility serving the community in question. Communities, especially large, diverse cities may be served by multiple CCAs, ESPs, etc.

BE.2	520		<p>“Appropriate emission factor” here might be inaccurate for this type of reporting, as a utility’s emission factor may be based on the utility’s own generation and purchases, and does not necessarily reflect the resources <i>delivered</i> to the community. It may also not account for imports and exports and may be based on purchases of RECs by the utility. We recommend that the Protocol allow for voluntary renewable energy purchases to affect scope 2 emissions from purchased electricity.</p>
BE.2	525		<p>Please consider a scenario in which the utility serving the community has a green-pricing option and a percentage of the residents of the community participate in this program, i.e. purchase zero-emissions electricity through the utility, or indeed purchase green power separate from the utility. We recommend that communities be able to report voluntary electricity purchasing within the community and either adjust scope 2 emissions for voluntary purchasing or report it separately.</p>
BE.2	544-545		<p>Does “utility specific electricity GHG emission factors that have been third-party verified” include or imply Green-e Energy certified utility green power programs? Please clarify.</p>
BE.6	1004		<p>The method for accounting for emissions from electric power production should account for RECs and/or offsets that have been sold off from facilities within the community boundary to external buyers, if any. And the Protocol should make clear that facilities must retain the RECs if the community claims zero emissions for a renewable energy facility.</p>