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			<p>combustion provide members with adequate reporting flexibility while maintaining an appropriate level of accuracy in the inventory? Why or why not?</p> <p>a) What criteria should TCR use to determine whether it is appropriate to estimate the proposed emission source(s) beyond the 5% threshold?</p> <p>b) Members wishing to report SEMs beyond the 5% threshold must submit (1) their proposed estimation method, and (2) an explanation of why they are requesting to use a simplified method, to TCR for review and approval prior to verification. Do you agree with this approach, or have a suggestion for an alternative procedure for approval of proposed simplified methods?</p>	<p>how this is consistent with the GHG Protocol Scope 2 Guidance.</p>
GHG Emissions Quantification Methodologies	Introduction to Quantifying Emissions	17	<p>See the box on Default Emission Factors for TCR's policy on selecting emission factors for calculating purchased electricity. The policy itself has not been updated from GRP v. 2.1 to GRP v. 3.0, but clarifies that when regional grid-average emission factors are based on more recent source data than other available market-based emission factors (such as supplier-specific emission</p>	<p>We agree that supplier-specific emissions factors may be more accurate than more recent regional grid averages. But the reverse is also true—regional grid averages may be more accurate than more recent supplier-specific emissions factors. “Recentness” does not appear to be the sole or best indicator of accuracy. Though supplier-specific emissions factors are more precise and appear higher in the hierarchy, it is unclear if there is an age at which it becomes more appropriate to use regional grid averages. This may have to be evaluated and</p>



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			<p>factors), the more recent regional grid-average emission factors must be used. TCR has received some comments that even outdated, supplier-specific emission factors may be more accurate than more recent grid-average emission factors. Additional feedback is requested on whether and how the policy described above should be amended to allow more flexibility to use supplier-specific emission factors (i.e., Market-C category emission factors) that are less recent than the latest grid-average emission factor for reporting emissions from purchased electricity using the market-based method?</p> <p>a) Under what circumstances would outdated supplier-specific emission factors be more accurate or appropriate than a more recent residual mix/grid average factor?</p> <p>b) If the policy should be amended, what should it allow and what limitations should apply?</p>	<p>determined on a case-by-case basis, so that data sources and specific accounting methodologies can be considered.</p>
Inventory Completion	Offsets	64-65	<p>GRP v. 3.0 allows the purchase and retirement of offset credits to be applied to Scope 1, Scope 2 or Scope 3 emissions in an adjusted inventory, separate from the primary inventory</p>	<p>It is not clear to us why offset credits could not be applied to net any emissions chosen by the reporting entity, including biogenic emissions. We are not aware of any guidance that limits the application of certified offsets to specific emission sources, or any rationale for restricting</p>



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			<p>totals. This policy is unchanged from GRP v. 2.1. Feedback is requested on whether the policy should be expanded to allow offsets to be applied to biogenic emissions in adjusted inventories.</p> <p>a) Should the policy be amended to allow the application of offsets to biogenic emissions? Please justify your answer.</p> <p>b) If adjustments to biogenic emissions are permitted, what limitations should be set, if any (e.g., specify that only offsets that reduce biogenic CO2 emissions may be used to adjust biogenic emissions in the inventory)?</p>	<p>the type of offsets that can be used to adjust biogenic emissions. There appears to be no basis related to accurate accounting for limiting the application of offsets to only similar emitting activities or emitting activities in the same sector.</p>
General			<p>What guidance topics would you like to see developed to assist you in your GHG reporting and meeting your sustainability goals?</p> <p>a) What guidance (or examples) in GRP v. 2.1 did you find most valuable?</p> <p>b) What topics should be expanded upon or added?</p> <p>c) What kind of information management or calculation tools would be most useful to assist in your GHG reporting?</p>	



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We would also appreciate general feedback on the draft GRP v. 3.0. Feedback on any of the key updates listed in the [cover memo](#) is particularly appreciated. You are welcome to make any number of general comments, technical or editorial, and add rows to the below table as necessary. Please be as specific as possible and suggest edits or clarifications, where appropriate.

General Feedback

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Accounting for RE Guidance	Role of Energy Attribute Certificates in the Market-based Method	1		We recommend also describing a situation where power is matched with unbundled RECs purchased separately from the power. In this case, the customer can claim the attributes of the REC generator.
Accounting for RE Guidance	RECs in the Market-based method	1-2		We support the reference to the Green-e certification program for renewable energy. Please change “Green-e Energy” to just “Green-e.”
Accounting for RE Guidance	RECs in the Market-based method	1-2		It is unclear whether the EcoLogo certification is equivalent to Green-e certification, and therefore it may not be appropriate to list EcoLogo alongside Green-e as an acceptable certification program for RECs. The EcoLogo standard is not freely available—it is behind a pay wall—and there do not seem to be any public documents about what is certified/verified. EcoLogo may be more widely accepted in Canada. We recommend that TCR conduct further analysis of EcoLogo and consider



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				potential limitations to its reference (e.g. EcoLogo for Canadian renewable energy or Canadian hydro only).
Accounting for RE Guidance	RECs in the Market-based method	1-2		We respectfully request an explanation for why TCR only encourages members purchasing unbundled RECs to seek out third-party certifications (e.g. Green-e). TCR could also encourage members purchasing bundled RE products (e.g. utility green power products, direct contracts for RE) to seek out third-party certified products, for whom the benefits of certification are largely the same.
Accounting for RE Guidance	RECs in the Market-based method	2	Regarding footnote 1, what are the criteria that TCR uses to evaluate certification programs?	
Accounting for RE Guidance	For organizations that own/operate renewable generation	3		Regarding footnote 7: this is the subject of some ongoing discussion among market participants. Here is one other perspective to consider: 1. It may not be appropriate to use the pro-rated EF for location-based calculations. Anyone can potentially claim an "island" even without a microgrid. It may not be helpful to allow customers to claim more use of a facility than others in the region on this basis unless everyone is using the same geographic approach. If some people are



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				<p>looking at the region and others are looking just at their local area, this creates a problem. This may highlight the limitations of location-based accounting.</p> <p>2. For these same reasons, it may also not be appropriate to use the pro-rated EF in market-based reporting. But beyond those reasons, under the market-based method, null power should be assigned the residual mix, not the pro-rated location-based EF, in order to approximate a 1-to-1 accounting between the REC purchaser and the REC seller/null power.</p> <p>In theory, the regional mix and delivered emissions factor in the area where the unbundled RECs were generated will be automatically affected (i.e. get dirtier), provided there is no double counting (i.e. there is no one claiming delivery or consumption of renewable energy without the RECs). For example, if a consumer is located in Pacific Gas & Electric (PG&E) territory in Northern California and buys an unbundled REC from a wind facility in Texas, her electricity becomes renewable and gets cleaner and the utility emissions factor and regional grid emissions factor in Texas gets dirtier (by one less</p>



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				<p>MWh of zero-emitting power). PG&E's mix has not changed, but the allocation has, from the unbundled REC consumer to the null power purchaser in Texas. The California consumer gets the REC and whoever gets the null power gets what she had.</p> <p>This may not actually happen in practice unless there is all-generation certificate accounting and power source disclosure, which there is in NEPOOL, PJM and NY. Until everyone is using the same system, null power should get the residual mix where it is located, not the residual mix of the region where the REC buyer is.</p> <p>So, it may be more appropriate to use a regional residual mix (e.g. the NEPOOL residual mix) rather than a pro-rated emissions factor for null power. For example, if the RE projects are located in NEPOOL and the RECs are being sold to buyers in NEPOOL, the NEPOOL residual mix should be used for null power in NEPOOL.</p>
GHG Emissions Quantification Methodologies	Indirect Emissions from Electricity Use	27	If the reporting entity is not paying for electricity, how can double reporting of scope 2 emissions be avoided where both the reporting entity and the entity paying for the electricity may be reporting scope 2 emissions for the same	



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			purchased electricity? This pertains to entities that could be using the area method or the average intensity method.	
GHG Emissions Quantification Methodologies	Indirect Emissions from Electricity Use	30		Under Location-A: Direct-line Emission Factors (if applicable), it says, “the emissions rate is ineligible to be claimed when energy attribute certificates are transferred to a third party.” Though we agree that this is appropriate from a credible claims perspective, perhaps even legally, this would appear to be a market-based stipulation nonetheless.
GHG Emissions Quantification Methodologies	Indirect Emissions from Electricity Use	32		In footnote 37: NYGATS in New York is also an all-generation tracking system.
Advanced Methods for Quantifying Emissions	Quantifying Direct Emissions from Mobile Combustion	47		The eligibility of contractual instruments for biofuels is not only relevant to mobile combustion emissions. Contractual instruments for biofuels may also be used for stationary combustion emissions, e.g. biogas used for thermal uses at a building instead of natural gas. We recommend that TCR also specify eligibility criteria for contractual instruments for biofuel for thermal uses.



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				<p>Relevant to that, CRS is beginning stakeholder engagement to develop a new Green-e Renewable Fuels Standard. This independent, third-party administered standard will accompany and complement the existing Green-e certification program for renewable electricity products by addressing the production, sale, and purchase of renewable energy for non-electricity end uses in the voluntary market. The initial focus of this standard and certification program will be on biogas (biomethane), with the potential to expand to other eligible renewable thermal technologies in the future, including solar thermal and geothermal.</p> <p>This new Green-e program will provide assurances of environmental quality and transparency in the voluntary market so that buyers can be confident in their purchases. CRS is proposing to develop a system to track the associated environmental benefits of each generated biogas unit and ensure that certified biogas meets the most stringent environmental and consumer-protection standards. This program will be the renewable thermal industry's first voluntary-market transaction-focused verification and certification program and standard. It will be available to products offered by sellers sourcing from eligible resources for their</p>



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				retail offerings, as well as large consumers purchasing biogas directly from suppliers. This standard is intended for use in the U.S. and Canada. CRS estimates the timeframe for the development and launch of a new biogas certification program as 12-15 months, including one or more pilot verifications during that timeframe.
Advanced Methods for Quantifying Emissions	Quantifying Direct Emissions from Mobile Combustion	51	Regarding validating residual mix emissions factors, are Green-e residual mixes acceptable? See https://www.green-e.org/docs/energy/Residual%20Mix%202018.pdf .	
Inventory Completion	Offsets	65		We support the reference to the Green-e certification program for carbon offsets. Please change “Green-e Climate” to just “Green-e.”