



Protocol Comment Form

Date: 6/10/03

Name: _____

Company Name: California Climate Action Registry

Mailing Address: 515 S. Flower St., Suite 1305, Los Angeles, CA 90071

Phone: 213-891-1444

Fax: 213-623-6716

Email: info@climateregistry.org

What is the issue or problem with the current Protocol?

Please select one: General Reporting Protocol Certification Protocol

BATCH CERTIFICATION: Both the GENERAL REPORTING and CERTIFICATION PROTOCOLs contain a "Key Questions" on "Batch Certification", as follows:

In an effort to minimize transaction costs, Registry participants who produce a maximum of 100 tons CO₂e/year from any combination of indirect emissions from electricity consumption, direct emissions from stationary combustion and/or direct emissions from mobile sources may request to participate in "batch certification" with similar organizations through the Registry. In that situation, bidding, contract negotiations, and the kick-off meeting will take place between the certifier and the Registry. Standard terms and conditions are expected to apply for all contract elements. The Registry will initiate the procurement process for batch certification. For more information about batch certification, contact the Registry at 1-877-CO₂-CCAR.

The Registry received feedback from certifiers that, while this process, as proposed, would help to bring down the costs of certification, they would still be relatively significant for participants.

What solution or alternative approach would address this?

On current page 1-6 of the CERTIFICATION PROTOCOL, update the question "Batch Certification" as follows:

"Batch Certification": How does it work? How will it affect bidding, contracting, and the overall certification process?

In an effort to minimize the transaction costs of certification, the Registry will help eligible participants with simple GHG emissions contract for "batch certification." Eligible participants have relatively simple GHG emissions (indirect emissions from purchased electricity and/or emissions from mobile sources) and produce less than 100 tons CO₂e per year.

In batch certification, the Registry will work with one certifier each year to verify the emissions reports of five or more organizations at one time. The Registry will assist in negotiating a standardized contract and a flat fee for each organization. Because of the nature of the emissions, batch certification activities will consist of document review and phone conversations, but will not require a site visit. Standardizing the contract language will help to minimize the transaction costs of certification for small, office-based organizations.

A new batch certifier will be chosen each year. This finite term is to minimize the risk from COI and to eliminate the cost associated with a case by case COI.

In Part 2 of the Certification Protocol, also expand and clarify the policies and procedures for Batch Certification as follows:

Batch Certification

In an effort to minimize the transaction costs of certification for small organizations with relatively simple emissions, the Registry will contract for batch certification for interested participants with simple GHG emissions. Eligible participants include those that produce 100 tons/CO₂e per year from any combination of indirect emissions from

electricity consumption, direct emissions from stationary combustion and/or mobile sources.

Procedures

Each year, the Registry will solicit competitive bids for batch certification services from at least three approved certifiers. After selecting a batch certifier, the Registry and the batch certifier will develop a contract template. Participants interested in batch certification will contact the Registry to express their interest. After confirming the participant's eligibility, the Registry will keep track of interested participants until a minimum of five participants are ready for certification (i.e., have reported their emissions in CARROT and submitted the data for certification). Each participant will sign its own, standardized contract with the certifier. If participants require non-standard contract language, they cannot participate in batch certification.

Once the contracts are signed, the Registry will work with the certifier to identify all necessary documentation, as requested by the certifier and as required in the General Reporting and Certification Protocols. The Registry will collect the necessary supporting documentation from the participants and forward it to the certifier. It is expected that batch certification will not require a site visit, but will consist of document review and phone conversations.

The certifier will phone each participant to understand their operations. Then, the batch certifier will review and assess the Emission Reports and documentation, and prepare the Certification Opinion and Report. The certifier will then phone each participant to discuss the findings, and upon authorization, will submit the Certification Opinion to the Registry.

To minimize any potential conflict of interest, the Registry will contract with a batch certifier on an annual basis, and the designated batch certifier will perform all eligible certifications for that calendar year of emissions. The batch certifier will be ineligible to bid on batch certification for the following three years. Because of this "term limit," the potential for COI is deemed low, and the requirement to request determination of COI from the CEC is waived.

How will this proposed solution continue to meet the general spirit and purpose of the Protocol and the Registry, as outlined in the Protocol itself, policies adopted by the Board of Directors and enabling legislation?

Further defining and detailing the guidelines for batch certification makes the process understandable for both participants and certifiers. This new procedure, with streamlined administrative procedures both protects the integrity of the certification process and also helps to minimize the administrative costs for organizations with relatively few emissions.

Return completed form by email, fax or mail to:
California Climate Action Registry
robyn@climateregistry.org
Fax: (213) 623-6716
515 S. Flower St., Suite 1305, Los Angeles, CA 90071

For Registry use only: