



Protocol Comment Form

Date: 6/20/03
Name: _____
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What is the issue or problem with the current Protocol?

Please select one: General Reporting Protocol Certification Protocol

Subject: Focus only on CO2 emission during first 3 years of reporting

The protocol requires companies to report, at a minimum, CO2 emission for their operations during the first three years of the reporting period. We agree that of the six GhG gases, a majority of the emissions from a company will be direct CO2 from fuel combustion. However, there are also significant sources of methane in a number of sectors that, if ignored during the first three years, could lead to a material change in a company's inventory in the fourth year. If a facility has significant methane emissions and only reports them in the fourth year, the resulting change in the inventory would call into question the overall veracity of the previous years data, especially if there were any identifiable emissions reductions.

What solution or alternative approach would address this?

Require the reporting and verification of both CO2 and CH4 emissions from all participants.

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?

It will prevent any concerns about the robustness of a company's inventory in years 1-3 if a significant source is accounted for in year 4.

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

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