



## **Comments on Draft Local Government Operations Protocol July 18, 2008**

### **Section 2.1, GHGs to be Assessed (page 15)**

We recommend allowing local governments to optionally report other GHGs beyond the six Kyoto gases listed (e.g. CFCs, NF3, etc.).

### **5.1.3 Recommended vs. Alternate Activity Data and Emission Factors (page 31)**

We recommend also noting whether a particular method is approved by the Climate Registry (in addition to the California Registry), as the Climate Registry will be most relevant for local government reporting in the future. If possible, the tier of the method from the Climate Registry General Reporting Protocol should be noted.

### **6.1.2.1. Fuel Use Estimates – Proxy Year Data (page 36)**

We question the inclusion of this alternate calculation approach and suggest removing it as an option. The benefit of comparing emissions over time is lost when a city uses a previous year as a proxy for the current year. Adjusting for HDD/CDD is not likely to resolve this problem. Additionally, cities should have access to purchase receipts for each billing cycle, so the recommended approach should be sufficient. You could clarify that this approach should only be used to estimate minor sources of emissions, such as sources that would be eligible for using a “simplified estimation method” in the Climate Registry.

### **6.1.2.2. Fuel Use Estimates – Comparable Facilities and Square Footage (page 37)**

If it is necessary to include this alternate methodology, the protocol should clearly state that it should only be used to estimate minor sources of emissions, such as sources that would be eligible for using a “simplified estimation method” in the Climate Registry (i.e., falling below a specified threshold). The problem with this methodology is that it does not yield a trend over time. Each year, presumably the estimated emissions will remain static because the building type and floor space remain static. Therefore any reduction activities (e.g. energy efficiency/conservation) will not appear as a reduction in the emissions inventory. Cities should determine each building’s actual energy use through purchase receipts, which should be readily available.

### **6.2. Electricity Use (page 39)**

We recommend that a *total* Scope 2 figure be calculated and reported, with sub-categories for street lights and other relevant sources provided as sub-totals.

We recommend that the recommended emission factor for calculating scope 2 emissions be the eGRID subregion default emission factor only; the recommended emission factor should not also include a utility-specific emission factor. As stated on page 40, “an electricity emission factor represents the amount of GHGs emitted per unit of electricity consumed.” While eGRID is not completely accurate due to data limitations, we understand that the eGRID regional emission factors

better represent the amount of GHGs emitted per unit of electricity consumed than utility-specific emission factors. Utility-specific factors represent a utility's particular mix of purchased or generated power, but do not necessarily reflect the mix of power being consumed by the end user, which is drawn from the grid as a whole, including power purchased or generated by other utilities. Therefore, the recommended emission factor should be default eGRID factors by subregion. This will also allow maximum consistency and comparability of scope 2 emissions data across local governments, since all have access to the same data source and will use the same methodology, while selectively using utility-specific emission factors would introduce inconsistency and incomparability for this important category of emissions.

### **6.2.2 Alternate Activity Data (page 42)**

We question the inclusion of these alternate methods because they introduce considerable inaccuracies and thereby compromise effective GHG management. If it is necessary to include them, we recommend stating that they should only be used to estimate minor sources of emissions, such as sources that would be eligible for using a "simplified estimation method" in the Climate Registry (i.e., falling below a specified threshold). [This comment does not pertain to estimating scope 2 emissions from leased building space where sub-metering is not available].

### **7.1.1.2.2 Fuel Estimates Based on Dollars Spent (page 65)**

Fuel prices vary widely within a given year. Gasoline prices have risen on the order of 100% since one year ago. Therefore this method will lead to results with very high levels of uncertainty. Local governments should be encouraged to track fuel consumption in addition to fuel costs, even if they have not done so in the past. Therefore we recommend excluding this method. If it is necessary to include this method, we recommend stating that it should only be used to estimate minor sources of emissions, such as sources that would be eligible for using a "simplified estimation method" in the Climate Registry (i.e., falling below a specified threshold).

### **7.1.1.2.3 Proxy Year Fuel Use Data (page 66)**

There is no guidance provided on how to adjust "proxy year fuel consumption based on estimated changes in fleet size and composition." This is likely to be a very inaccurate calculation. The only accurate way to track CO<sub>2</sub> performance from a vehicle fleet is to track fuel use. As an example, anticipated fuel savings from hybrid purchases may not be fully realized, so in such a case, this estimation would overstate GHG reductions. On the other hand, increases in fuel costs may decrease fuel use more than would be expected from changes in fleet size and composition alone, so in this case, this estimation would understate GHG reductions. Due to the high expected uncertainty, we recommend excluding this method—particularly given the other alternative methods already suggested. This method should not be necessary.

## **Chapter 8, Power Generation Facilities (page 75)**

We recommend you change the term "direct" to "scope 1" in the two following cases, to avoid any confusion:

"Non-fossil carbon bearing fuels (e.g., landfill gas, wood and wood waste, etc.) may also be combusted in power generating facilities. You should not report biogenic CO<sub>2</sub> emissions as **direct** GHG emissions (see Chapter 4, Section 4.6). However, it is important to identify the contribution of these emissions as a part of your overall activities. Thus, you must identify and report biomass CO<sub>2</sub> emissions as biogenic emissions in a category separate from fossil fuel emissions. Note that CH<sub>4</sub> and N<sub>2</sub>O emissions from the combustion of biomass are not

considered biogenic and should be calculated and reported as part of your **direct** emissions inventory.”

### **Chapter 13 Local Government Operations Standard Inventory Report (page 110)**

We foresee confusion by the use of the term “standard” to refer to the Local Government Operations Protocol, for example as stated in: “The Local Government Operations Protocol establishes a program-neutral standard.” We see the GHG Protocol Corporate Standard as the program-neutral standard upon which the Local Government Operations Protocol is founded (as acknowledged on page 11), so we recommend not calling this protocol a standard, but instead “program-neutral guidelines,” “program-neutral protocol,” etc. We also recommend amending the use of the word “standard” in the following sentences:

“Line items which are not identified as “optional” in the Protocol should be included in every complete report in order to meet the **standard**. Items considered “optional” are encouraged as good practice, but a report can be considered complete to the **standard** established by this Protocol without them.”

Instead of using the term standard, the text might say “compatible with this Protocol”, “in compliance with this Protocol,” “meeting the requirements of this Protocol,” etc.

#### **13.1.2.1 Scope 1 and 2 Emissions (page 111)**

In addition to reporting emissions by the sectors listed in this section, we recommend that local governments report total scope 1, total scope 2 emissions, and total scope 3 emissions. This should be reported to allow comparison with all other GHG reporting programs, including the Climate Registry, the California Climate Action Registry, ICLEI, and in line with the GHG Protocol Corporate Standard.

#### **Information Items (Page 117)**

- We recommend changing “Biogenic CO<sub>2</sub> from Combustion” to “CO<sub>2</sub> from Biomass Combustion” to be consistent with the GHG Protocol.
- Earlier it is stated that offsets and RECs should be recorded only when purchased and retired; perhaps this form should reflect offsets *retired* and RECs *retired*, instead of only purchased. (These terms also appear on page 125)
- There is a line provided for converting purchases of RECs (in MWh) into emissions (CO<sub>2</sub>e). There is no established methodology for doing this calculation, and none is provided in this protocol. We recommend removing this line since we are not aware of any credible basis for estimating the emissions reductions associated with a given REC purchase. It would be more transparent and accurate to simply report MWh of RECs purchased.

### **Chapter 16 Program Specific Reporting Requirements (page 142)**

There should also be program-specific reporting requirements provided for the Climate Registry, in addition to CARB, CCAR, and ICLEI. Many local governments will be participants in the Climate Registry, so we see this guidance as very important.