

Draft Local Government Operations Protocol – 19 June 2008
Comments from the Carbon Disclosure Project

Dear Rachel,

I am the technical manager at CDP and am responding on behalf of the organization. Firstly, thank you for inviting comment from CDP on this draft protocol.

The protocol is very clearly written. Organizations are provided with a great deal of information that will assist them in making their reports and offer transparency and standardisation in the methodologies used to reach the final figures.

I only have a very few remarks:

Page 45 - Section 6.2.4

This section would benefit from explicitly stating the emissions factor that should be used to calculate emissions associated with electricity taken from the grid.

The wording that we issued in our guidance with this year's questionnaire (CDP6) is:

CDP has sought advice from the GHG Protocol team on the issue of accounting for emissions from electricity sourced from the grid and purchased via a tariff or other financial arrangements with the aim of supporting renewable generation. The protocol team has given this interim advice pending a wider examination of the issues in this area:

The emissions associated with ALL electricity sourced from the grid should be calculated using the grid average emission factor and should be reported under Scope 2. If companies wish, they may list the types of electrical generation that feed into the grid and give the relative contributions that these types make to the electricity on the grid.

However, contractual arrangements aimed at supporting particular types of electrical generation, such as a renewable electricity supply tariff, should be reported separately.

Companies are welcome to give as much detail as they can about the contractual arrangement, for example the number of KWh covered by the arrangement, the generation mix supported by the arrangement, and the certification associated with the scheme.

Companies may also compute an alternative emissions total, taking into account the contractual arrangement, e.g. "green tariff", based on the number of kWh purchased and the average emission factor of the electricity purchased through this arrangement, rather than the grid average emission factor. This alternative figure must be labelled "Contractual Scope 2" and reported separately from the emissions total based on the average emission factor of the actual electricity consumed from the grid, which should be reported under Scope 2. CDP's online reporting system allows for additional information to be presented in response to all questions.

The definition of renewable energy in the GHG Protocol is: "Energy taken from sources that are inexhaustible, e.g. wind, water, solar, geothermal energy, and biofuels."

A distinction should be drawn between:

- Electricity sourced from the grid and purchased under a tariff designed to support a particular type of generation, e.g. renewable electricity which is described here as "contractual renewable electricity", and
- "Purchased electricity from renewable sources" and "MWh from renewable sources" which is defined here as purchased electricity supplied directly by a renewable electricity generation facility.

We are currently working on next year's questionnaire and guidance and are re-considering the wording of this section. We would be pleased to discuss this aspect of GHG accounting in more detail with you.

Page 112 - Section 13.1.2.3

Tons of solid waste accepted in the inventory year

This indicator would benefit from an explanatory note to ensure that all readers are interpreting "accepted" in the same way. For example, does "accepted" mean the tonnage of solid waste collected by the local government concerned or its contractor or does this mean the tonnage of waste accepted for disposal at a landfill site or incinerator operated by the local government?

Page 113 Section 13.1.2.4

I have suggested some alternative wording as carbon in fossil fuels did have its origin in atmospheric carbon dioxide.

Biogenic CO₂ from biomass combustion. Following established international greenhouse gas management principles, emissions of CO₂ from combustion of biomass are not included as a Scope 1 source because the carbon "concerned is of biogenic origin and would have emitted carbon dioxide to the atmosphere through the natural process of decay." [Deleted: embodied in these emissions is not new to the atmosphere.] However, in order to more completely represent the local government's energy use, the total CO₂ released from biogenic combustion should be reported as an information item. Biogenic combustion here includes both stationary and mobile sources.

Regards
Andrea Smith
Technical Manager
CDP