

Local Government Operations Protocol Comments City of Phoenix

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Specific comments on the document:

1. p. 84: The term 'stationary combustion source' needs to be clearly defined. Is the term stationary combustion source referring to one point/unit or is it the facility? It would be best to define it the same way as the Federal air regulations to reduce confusion BUT it would be best for us if it was by unit as it would require less reporting meaning only a flare which emits over 25,000 met tons CO2 Eq would need reporting.
2. p. 84: Clarify that for MSW flares (or other units) that the combustion by-products from methane combustion are included in the GHG totals.
3. p. 85: Spell out FOD model so it is clear what FOD refers to.
4. p. 91: Under Step 4, here the terminology 'accredited source test provider' is used. Is there an expected accreditation requirement on source testers? Note that on page 90 under Step 2 this terminology is not used. we recommend that all data from a source test accepted for reporting purposes by a regulatory agency be acceptable.

General/Other Comments:

5. p.16 - The document does not allow for the calculation of carbon sinks and does not allow for any offset use. At this early stage in the protocol development it is preferable to keep the accounting simpler and accurately characterizes emissions at specific facilities. This reduces the risk of being compared with other sources which may be offsetting emissions but look like they are emitting less. The use of offsets would likely require the need of 3rd party verification.