
MEMORANDUM

TO: THE CLIMATE REGISTRY
FROM: RENEE ZOLLINGER, SALT LAKE CITY, UTAH
SUBJECT: SUGGESTED REVISIONS TO THE LGO PROTOCOL
DATE: 7/17/2008
CC: VICKI BENNETT, SALT LAKE CITY DIRECTOR OF SUSTAINABILITY

The protocol is well written, well organized, and easy to use. Here are our comments, suggestions, and questions.

Section 6.6, Page 54, Second paragraph, Second sentence.

Is the word “land” supposed to be “and”?

Section 8.2, Page 76.

I think it would be useful to emphasize in the text that the CO₂ being calculated for stationary combustion includes the “pass through” CO₂ in your fuel stream. LGOs that combust landfill gas may be uncertain whether to include both CO₂ produced from the methane combustion and CO₂ originally present in the landfill gas and passed through the combustion system and emitted. If they don’t use the default emission factor, they may calculate their own based on just the CH₄ portion of the landfill gas.

Tables 9.2, 9.3 and 9.4, Pages 88 and 89

Are the sources (IPCC and EPA) incompletely referenced?

Section 9.3, Pages 85 to 94

It appears inconsistent to calculate just the fugitive emissions of methane from landfill cap leakage, and not also calculate the fugitive emission of CO₂ in landfill gas leaking from the landfill cap (to be reported as a biogenic emission). Under Section 8 guidance, it appears that this portion of CO₂ in landfill gas captured and subsequently used for power generation would be reported as a biogenic emission of CO₂. However, under Section 9, it appears that unrecovered landfill gas is only included in Scope 1 emissions of methane, and the CO₂ portion of the leaking landfill gas would be ignored.

Section 9.3.1, Page 87, “Step 1”, Second paragraph

It looks like a link to the guidance was broken, producing “Error! Not a Valid Bookmark”.

Section 9.4, Page 94, Second Paragraph, Fourth Sentence

Should “per cent” be one word, “percent”?

Section 10.3.2.2 Definitions

Text states P is population served by WWTP “with” nitrification/de-nitrification. Should it be “without”?

Chapter 12

What about biogenic Scope 3 emissions (e.g., biofuels used by a contracted waste hauler)? Are these reported as an aggregate number with biogenic emissions from other scopes? Or are they separated by scope?

Section 13.1.2.1

Can you clarify whether an LGO that generates heat (but not power) for others (customers outside the LGO), reports those Scope 1 emissions under the Facilities sector, or under the Power Generation Facilities sector?

Under the 2nd order bullet under Power Generation Facilities, should “faculties” be “facilities”?

Section 13.1.2.3

LGOs that operate ports or airports may like to see suggested metrics relating to passenger numbers.

Section 13.1.2.4

As above, please clarify whether the biogenic emission noted as an information item includes Scope 3 biogenic emissions, and whether all scopes of biogenic emissions are lumped together or if they are disclosed separately by scope.

Section 13.1.3, Paragraph 1, last sentence.

“This disclosure should site...” should be “This disclosure should cite...”

Section 13.1.3, Paragraph 2, last sentence.

“Rational” should be “rationale”.

Section 13.1.4, Paragraph 1.

Sometimes we use “emissions factors” and sometimes we use “emission factors”.

References, Chapter 9.

It is a little confusing having a general reference section, followed by some chapter-specific references but only for chapters 7 through 10. It would be clearer to have all the references blended, or to list every chapter’s references individually. Also, it would be helpful to preface each reference with the same abbreviation as is used to call it out in the text (e.g.: [IPCC] Intergovernmental Panel....).

References, Chapter 9, Second reference.

There is still a “?” after “Kong”

References, Chapter 9, Fourth reference.

Is “pf” supposed to be “of”?

General Comments

Unlike the General Reporting Protocol, there is no section discussing third party verification. For small to medium LGOs, the cost of rigorous third party verification is not warranted, and is not the best use of taxpayer funds. We would like to see a low- or no-cost alternative that still supports the efforts of LGOs to disclose and pursue change, without discouraging them with high annual verification costs. Could the Climate Registry provide an option for unverified posting for LGOs with emissions below a certain threshold, or a reduced verification requirement for all LGOs that do not choose to participate in a carbon market and are not otherwise required to report?