

City of Seattle
Public Comment on Local Government Operations Protocol
July 18, 2008

General Comments

Overall, the City of Seattle feels the draft protocol is very strong. It closely resembles the CCAR protocol which Seattle City Light and Seattle Public Utilities have been using for some time. Our biggest concern is with the methodology in for Solid Waste and Landfills, which requires data that the Seattle Public Utilities does not have. Additionally we have concerns about the methodology's aim for precision even though the base assumptions are very rudimentary.

Purpose Statement – Part I Introduction

The City of Seattle thinks a purpose statement is a very useful part of a protocol. However, the draft purpose statement seems to confuse the purposes of an Operations Protocol and a Community Protocol. To our mind, purpose of an Operations Protocol is help cities understand the carbon emissions impact of their corporate actions. We would recommend narrowing purpose statements like—“Promote understanding of the role of local governments in compacting climate change”—to focus more on the cities corporate role rather than its policymaking role.

Electricity Use –Section 6.2

6.2.1 - We are pleased to see that the draft protocol allows for verified utility-specific emission factor or eGRID subregion default emission factor. Seattle is in the somewhat unique position of owning a vertically integrated electric utility, which enables us to have very accurate information about our local emissions factor.

6.2.4 - The City of Seattle makes significant use of the green power programs and renewable energy credits. Purchase of green power is one way that cities can support renewable energy through corporate operations. As suggested in the draft protocol, we encourage you to develop a specific accounting framework for green power purchases.

6.2.5 – The City of Seattle believes that T&D losses should be reported by the generator rather than the owner of the transmission lines. As owner of transmission lines, Seattle City Light cannot prohibit other generators from using the lines for transmission if space exists. However, City Light has no control over emissions portfolio of the electricity distributed on its lines by a 3rd party generator.

Solid Waste & Landfills – Section 9.3

The City of Seattle will be unable to satisfy the data needs of landfill element of this protocol. We do not have the front end data (tons/year, waste composition and percent burned) to even make a guess at the generation rates for any of the sites. Therefore, in our

case estimation based on actual scaled data with some minor modifications based on model inputs will be the most accurate.

More generally, we have significant concerns with the model used for landfills. The model is overly complex and not grounded in real world data. One of the biggest weaknesses in our opinion is that many of the component equations are modeled to a high level of assumed accuracy, yet the entire model is then modified by very gross assumptions. Bluntly put, the model is akin to measuring with a micrometer and then calibrating with a sledge hammer.