

## Metropolitan Council (Minnesota) Comments – 7/15/08

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### Local Government Operations (LGO) Protocol

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| <b>Council Comment No.</b> | <b>LGO Section Number</b> | <b>LGO Page Number</b> | <b>Comment</b>  |
|----------------------------|---------------------------|------------------------|---|
| 1                          | 3.2                       | 18                     | In our experience, “wholly owning” assets doesn’t always means the Government has operational control. Two examples are: 1) we have a public-private partnership where we own the facility, but have a design-build-operate agreement with a private party that has a 20 year service agreement to operate based on performance standards and a price formula – we do not control their operational methods or procedures, and 2) we own buses that are used by suburban transit providers that we do not control operationally. Perhaps owning an asset could be default proof of operational control but with an allowance for a government to document and exempt non-standard situations like the above examples? |
| 2                          | 4.1                       | 25                     | TCR’s general protocol requires inclusion of biogenic source emissions in scope 1 – albeit segregated from fossil fuels. This LGO protocol explicitly says biogenic emissions should be excluded from scope 1. Please explain the treatment expected.   |
| 3                          | 4.2                       | 25                     | Transit, housing, airports, and liquor store operations should be sectors just like water and wastewater operations as they are often operationally distinct and run as enterprise funds. If not made a separate sector please clarify if they are expected to be reported in “Buildings and Other facilities”?   |
| 4                          | 6.2                       | 39                     | We disagree that scope 2 emissions should be reported only for the three listed sectors. The electricity for our light rail transit facilities is substantial and should be included separately.  |
| 5                          | 6.2.4                     | 45-46                  | Discrete purchases of green power for which emissions can be separately identified should be allowed to use the appropriate emissions factors and not the overall utility average (e.g. we have bought Xcel Energy’s wind source power for special occasions). If separate emissions factors are allowed what verification requirements apply.  |
| 6                          | 6.2.5                     | 46                     | Should we report loss of power where we own the electrical sub stations or for lines within our facilities?   |
|                            | 8                         | 75                     | We own a cogeneration facility (3-4 Mw) that is powered by burning wastewater sludges, but the  |

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|  |                  |     | steam and electricity are used entirely within the wastewater facility. Such facilities should be explicitly included in the wastewater sector. Solid waste operations (refuse derived fuel and mass burn technologies are in use in the metropolitan Minnesota region) also sometimes generate power for their own use.   |
|  | 8.2<br>(Box 8.1) | 77  | In the paragraph for waste fuels please give guidance for facilities that combust wastewater sludges; is there a non-biogenic component?   |
|  | 13.1.2.1         | 111 | This list of sectors misses significant local government operations including transit, housing, airports and municipal liquor stores and golf courses. We disagree with putting all vehicle fleet information into its own sector. For example, wastewater vehicles and equipment (including lawn mowers) should be grouped with the wastewater sector. Doing otherwise would dilute the meaningfulness of both the Transit/vehicle and the wastewater sectors. Moreover, for us these activities are enterprise funds and much of their revenues are restricted to that use so compiling the data in the sectors as currently described would be organizationally difficult. <b>Perhaps you can make exception for enterprise funds so that their ancillary operations continue to be grouped within the primary sector for which they occur?</b> |