



Rachel Tornek
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Dear Ms. Tornek:

I would like to congratulate the Climate Registry and its partners on the publication of the Draft Local Government Operations Protocol and thank you for the opportunity to provide comments on this draft.

Overall I find this to be an excellent document. It provides the type of guidance that is needed by local governments in reporting under the CR protocols. I find the level of technical explanation and operational advice appropriate for the intended users. In general it is consistent with established practice in the field and it makes reasonable compromises between best practices and practical considerations including the availability of data.

The main focus of my review and comments is on the recommended approach to the measurement of Scope 2 emissions, specifically the off-site electric power generation sector in Chapter 6 of the protocol. I recognize that this is one of the more difficult areas to provide protocol guidance and that existing protocols including the CR and WRI protocols are themselves not sufficient in this area. My specific comments are as follows:

1) There is a problem with the use of the EPA eGRID sub-region emission rates recommended in Table C.5. These are system average emission rates and do not represent the actual emissions that occur as the result of specific power purchase made by a specific consumer. The problems relate to both the definition of the geographic area where the power purchases are made and the timing of the power purchases. Power purchases made, for example, for water supply pumping or traffic signals are typically continuous throughout the year, while power purchases for air conditioning are concentrated in specific hours of the day and mainly in the summer months. As a result, the emission rates from those power purchases are also different because the emission rates on the system delivering the power change daily and seasonally. Time matched emission rates are necessary to provide accurate estimates of a specific reporter's indirect emissions. The lack of data at this level will create problems when year-to-year reporting is used as a way of tracking emissions reductions that result from implementing electric energy efficiency measures. The same problems will also occur if a reporter makes a renewable power purchase. All other things being equal reporting in subsequent years would show a reduction in emissions based on the system average emission rate, whereas the actual emission reductions from a renewable energy purchase should be based on time-matched marginal emission rates.

2) The eGRID data is seriously out of date by the time it is used and the sub-regions do not always coincide with actual power market dispatch areas. A reporter may have difficulty in being consistent from one year to the next when using the eGRID emission rates because these emission rates may not be representative of the specific reporting year.

3) In my opinion the result of using eGRID emission rates as recommended will make it difficult to meet the CR Verification Protocol requirement, of plus or minus 5% material difference, when reporting emissions. Guidance on how third party verifiers should deal with this is needed.

4) I support the concept of permitting the use of unverified utility specific emission rates in Chapter 6.2.3 of the protocol but the protocol should provide clear guidance on how such emission rates should be derived. Based on my comments above, I would not recommend that they be based on the existing eGRID emission factors for specific plants. I would suggest that the protocol allows those reporters that wish, to combine the use of EPA continuous emission monitoring data for specific units with the use of time matched dispatch models. Reference should be made to the WRI Guidelines for Quantifying GHG Reductions from Grid Connected Electricity Projects.

5) A protocol on incorporating Renewable Energy Certificate purchases is needed.

Thank you considering these comments. I recognize that some of these issues are complex and that it may not be possible to address them all in this version of the protocol. I would be pleased to provide additional input on subsequent revisions.

These comments have been made as the result of my experience with GHG emission measurement and verification for local governments especially for the Metropolitan Washington Council of Governments (MWCOG). That work has been supported by funding from the US Department of Energy. These comments are my own and not those of the MWCOG or the US DOE.

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