

Comments on *Local Government Operations Protocol*
Submitted by the Utah Department of Environmental Quality

General Comments

Our primary concern with the protocol is that it should be as easy and as inexpensive as it can be. Reporting GHG emission should not be punitive for those cities who simply want to make a statement and do the right thing and have little interest in participating in a cap and trade program. The protocol seems geared toward quantifying emissions with the accuracy needed for a cap and trade program and thus may exclude cities that wish to report GHG emissions for the purpose of acting as an example to businesses in those cities to do the same.

Specific Comments

Chapter 3.6.2—Page 22

Requiring a lessor using the Financial Control consolidation method to report operating emissions of the leased facility may lead to double counting if the lessee is reporting emissions using the Operational Control consolidation method.

Chapter 4.6—Page 28

Requiring reporters to include CH₄ and N₂O but not CO₂ from combustion of biomass as Scope I emissions is going to cause confusion for reporters. Many reporters will find requirements such as this too complex and time consuming, which will discourage participation. This is an example of our primary concern with the protocol described above.