

Geraldine Matchett
Steering Committee Chair
Greenhouse Gas Protocol

Ovais Sarmad
Steering Committee Vice Chair
Greenhouse Gas Protocol

Dear Ms. Matchett and Mr. Sarmad,

The Greenhouse Gas Protocol (GHGP) Scope 2 guidance has been an important enabler in building corporate demand for clean and renewable energy, spurring the growth of renewable energy markets and supporting the deployment of renewable energy on grids across the world.¹ However after 10 years these rules must be updated to ensure more transparent and accurate emissions reporting, drive new, around-the-clock renewable deployment, and prevent cost-shifting onto all ratepayers for the benefit of a powerful few. This is especially true as we face unprecedented demand growth, especially from hyperscale technology companies.

To that end, the undersigned organisations:

- **Strongly support the hourly and local matching requirements of the proposal** that will drive real decarbonization by aligning corporate emissions reductions claims with investments in renewable energy that credibly displace fossil fuels.
- **Call for stronger measures to support more buildout of new renewable energy**, by strengthening ‘Standard Supply Service’ into a requirement on the age of assets that can be claimed for emissions reductions.

Under today’s rules, a company can rely on a fossil-heavy electricity grid for their true power demand and buy clean certificates from solar plants a continent away to claim “zero electricity-based emissions” all year, even at night. These claims can be made even if they are adding load that directly drives the deployment of new fossil generation. For example, Meta’s new data center in Louisiana is driving the buildout of over 2 GW of new gas generation.² But even as their demand is met by a fossil-heavy grid, a spokesperson for Meta accidentally highlights the fallibility of current GHGP rules: “Meta’s 100% clean energy commitment uses methodologies from the Greenhouse Gas Protocol.”³

¹ [Corporate Clean Power Buying Grew 12% to New Record in 2023](#), Bloomberg, February 13, 2024.

² [Gas continues to dominate Entergy plans as data center pipeline grows](#), Utility Dive, November 3, 2025.

³ [Entergy La. Confirms Meta Data Center Behind 3 Proposed Gas Plants](#), RTO Insider, December 5, 2024.

These reporting rules are clearly no longer fit for purpose to transparently communicate a company's carbon emissions, and they do not incentivize the high integrity actions necessary for deep and efficient grid decarbonization everywhere. They must be changed.

The proposed updates to the GHGP Scope 2 rules⁴ are an important step in the right direction towards greater integrity, impact, and feasibility for honest emissions reporting and driving the deployment of round-the-clock clean electricity and storage.

First, there are two elements of the proposal that are highly impactful and must be retained:

1. Local matching will ensure claimed clean electricity incentivizes decarbonization on the grids companies actually operate on.
2. Hourly matching will ensure claimed clean electricity is being produced at the same time as it is needed and consumed, and provide an incentive for companies to invest in a range of renewables and storage that cover harder hours of the day and night.

Second, there is a promising element that should be further strengthened:

'Standard Supply Service' seeks to drive additionality and prevent the most egregious resource shuffling by limiting the claims that can be made by companies on existing clean energy resources that are publicly-funded or used for regulatory compliance. In this era of unprecedented demand growth, driving the buildup of new renewable energy generation is crucial to ensure fossil fuels are being displaced in the economy.

For even more impact, the undersigned organizations call for a stronger requirement to be developed in place of Standard Supply Service that would drive even greater additionality. This "incrementality requirement" should require all qualifying clean generation used in Scope 2 reporting to have come online or been repowered no longer than 10 years before any purchase or contract underpinning a claim is initiated. This will ensure that GHGP Scope 2 rules will drive much needed investments in new renewable electricity generation.

Finally, the Scope 2 proposal as written could support more affordable decarbonised electricity for ratepayers. Research shows that when companies procure clean electricity matched in time and location as their energy use, the grid is used more efficiently and there are system-wide savings that can be passed onto ratepayers.⁵ Today's annually matched portfolios allow companies to claim 100% clean operations based on buying the cheapest available renewable power, often from grids faraway, while ratepayers pick up the tab for ensuring the grid is able

⁴ [GHGP Scope 2 Public Consultation](#)

⁵ [Advancing Decarbonisation through Clean Electricity Procurement](#), IEA, 2022

to provide power for everyone at all times and in all locations.⁶ Adding the requirement to ensure all procured clean power is new, so that ratepayers are not left covering the costs of new generation to meet new power demand, will have an even greater impact on affordability and emissions reductions.

The status quo rules currently in place are unacceptable. There can be no weakening of the Scope 2 proposal as written. Our proposed reinforcement of the incrementality requirement will serve to further strengthen the proposed update.

Sincerely,

350 Colorado
350 Kishwaukee
AI + Planetary Justice Alliance
Alliance for Affordable Energy
Amazon Employees for Climate Justice
Beyond Fossil Fuels
Change the Chamber
Check My Ads
Chesapeake Climate Action Network
Climate Reality Project Chicago Metro Chapter
Cloud Sustainability Watch
Critical Carbon Computing Collective
Critical infrastructure lab
Dayenu: A Jewish Call to Climate Action
Energy Unlocked
EnergyTag
Environment America Research & Policy Center
Environmental Coalition on Standards
Friends of the Earth Ireland
Girl Plus Environment
Global Action Plan
Green Web Foundation
GreenLatinos
Greenpeace USA
Illinois Environmental Council

⁶ [Modelling 24/7 Carbon Free Electricity \(CFE\) in Asia](#), Transition Zero; [Advancing Decarbonisation through Clean Electricity Procurement](#), IEA

Just Shift
Kairos Fellowship
Michigan Clinicians for Climate Action
Mouvement Ecologique
Natural Resources Defense Council
Neuland - Büro für Informatik GmbH
Public Citizen
RESET – Digital for Good
Save Our Illinois Land
ShareAction
Sierra Club
SMEX
Stand.earth
Tu Nube Seca Mi Río
Union of Concerned Scientists