

# A Preliminary Look at Public Responses to the GHGP's Scope 2 Consultation



The Greenhouse Gas Protocol (GHGP) recently closed its public consultation on Scope 2 revisions. While we wait for the official release of all submissions, a few organizations have already publicized their positions and are beginning to paint a picture of public response.

So far we've tallied over [35 public responses and statements](#) across sectors, including academics, experts, industry groups, and NGOs [1]. These responses include full survey copies, as well as groups who have released position or summary statements. The GHGP received over 1,400 responses in total, so this small sample is not yet representative of the full global response. However, these early disclosures from key experts and industry giants offer a vital first look at the direction of travel for corporate carbon accounting.

## Responses show broad opposition to the status quo

Based on the responses we've tracked so far, it is not debated that the current Scope 2 Market-Based Method (MBM) is in need of improvements.

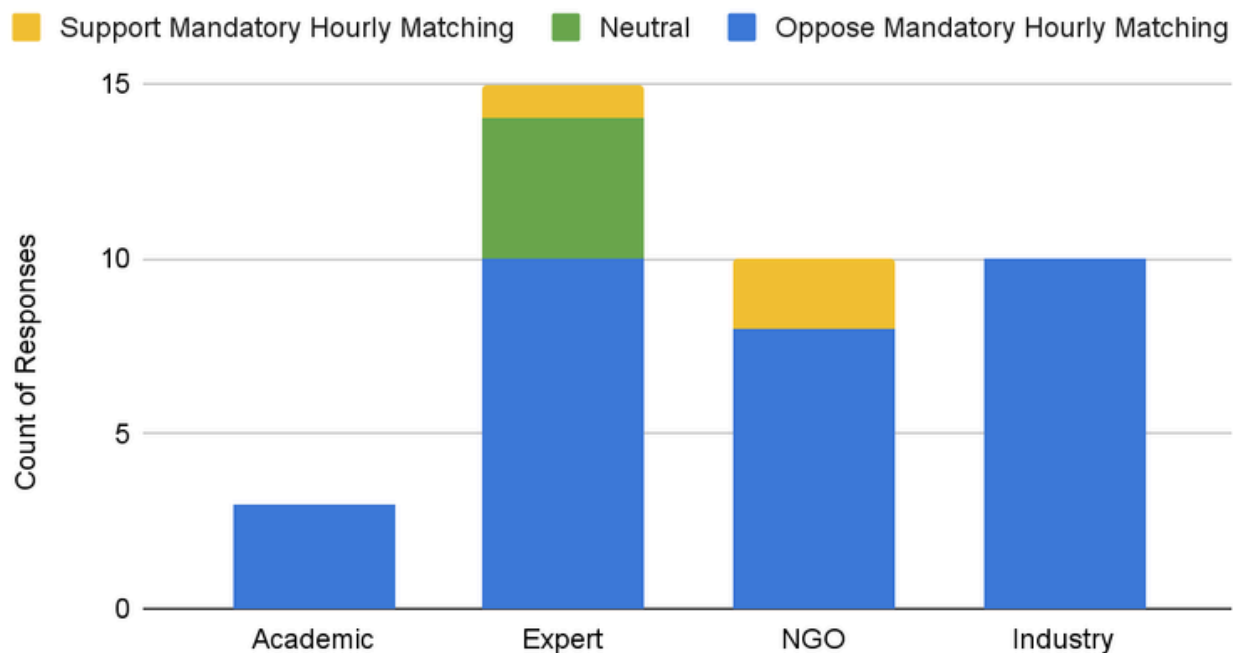
- **Academic:** Academics agree that the GHGP is making the right move by revising the MBM. As [Johns Hopkins' Yury Dvorkin](#) puts it, *"In today's highly uncertain environment, the future viability of the Scope 2 framework hinges on reconciling its accounting conventions with the physical realities of electricity grid operations."*
- **Expert:** This group shows the most internal diversity on proposed changes, but experts agree that the current methodology doesn't cut it. [3Degrees](#) explains *"it is **essential** to provide the GHG Protocol team with input and feedback so they can properly assess the benefits, challenges, and practicality of the proposed changes."*
- **Industry:** While many early responses from trade groups and industry leaders show opposition to the current trajectory, they agree that the MBM needs revision. [Clean Energy Buyers Association \(CEBA\)](#) summarizes: *"There is an opportunity to update the GHG Protocol to make various targeted updates that will unleash a broader menu of options that enable the most customers possible to help drive investments in systemic grid decarbonization, rather than narrowing options."*
- **NGO:** This group differs in opinion on the best approach, but all agree that there is opportunity for improvement. [EnergyTag](#) puts it simply: *"Current rules are too inaccurate to be credible."*

[1] Responses are categorized into the following groups: Academics (university and college faculty), Experts (Scope 2 and carbon accounting, energy modeling, and climate tech specialists), Industry (corporates and trade group organizations), and NGOs (non-profit non-governmental organizations).

## Many public responses oppose mandatory hourly matching

While there is broad alignment that change is needed, organizations have differing opinions on how. Many organizations argue that strict hourly requirements could hurt global clean power development and increase complexity without necessarily driving the intended grid-level decarbonization. Early feedback includes:

- [Harvard University](#) expressed concerns regarding the theoretical foundations of the proposed changes. All academics that have released comments so far do not support the current direction, and suggest changes different from those proposed by the GHGP.
- [CEBA](#) and [American Council on Renewable Energy \(ACORE\)](#) have signaled opposition, focusing on the need to maintain flexible procurement options that work for all corporate buyers.
- The [National Association of Manufacturers \(NAM\)](#) and the [U.S. Chamber of Commerce](#) have voiced significant concerns regarding the impact on industrial competitiveness and reporting burdens.
- The [European Financial Reporting Advisory Group \(EFRAG\)](#) opposes the direction of travel towards mandatory reporting, flagging that this change should be introduced on a voluntary basis to ensure flexibility and transparency.



**Image 1:** Public responses to the GHGP's Scope 2 survey organized by hourly matching sentiment.

## However, hourly matching does have some support

Conversely, a smaller but vocal group of supporters argues that hourly matching is the only way to ensure corporate claims align with physical grid reality.

- [The Natural Resources Defense Council \(NRDC\)](#) emphasizes that the proposed changes are a "once-in-a-generation chance" to fix corporate emissions reporting and drive real investment in new clean energy.
- [EnergyTag](#) supports the shift, advocating for the increased transparency and accuracy that granular data provide.
- [The Green Web Foundation](#) also threw its support behind more rigorous accounting standards.

## More to Come

This is just the tip of the iceberg. We will continue to track public responses as we wait for the GHG Protocol to release the full 1,400+ responses. Notice a public response that's missing from our [database](#)? Let us know - reach out to us at [info@pragmaticcarbon.com](mailto:info@pragmaticcarbon.com)