



World Business Council for Sustainable Development



WORLD
RESOURCES
INSTITUTE

The Greenhouse Gas Protocol

Product Life Cycle Accounting and Reporting Standard

Comment Template

We are providing this template to streamline public comment submissions. To use this template, please follow the instructions below:

- The Product draft is open for stakeholder comment from November 11, 2009 through December 21, 2009.
- To provide written comments, please use the comment template provided, instead of sending comments in a separate file or e-mail, in order to streamline the comment process.
- When using the comment template, please organize comments by chapter/section and reference page numbers and line numbers.
- If you have questions during the public comment process, please email Holly Lahd at hlahd@wri.org.
- Submit comments as an attached MS Word file by email to Holly Lahd at hlahd@wri.org no later than **Monday, December 21st, 2009**. We appreciate any effort to submit written comments before the deadline.

Feedback from (name): Leah Fry

Organization: National Grid

Chapter/Section	Comments
The outline and overall structure of the document	•
1. Introduction	•
2. Principles of Product GHG Accounting	•
3. Overview of Product GHG Accounting	•
4. Establishing the Methodology	•
5. Defining the Functional Unit	•



6. Boundary Setting	•
7. Collecting Data	•
8. Allocation	•
9. Assessing Data Quality and Uncertainty	•
10. Calculating GHG Emissions	•
11. Assurance	•
12. Reporting	•
Appendix A: Data Management Plan	•
Appendix B: Additional Guidance on Collecting and Calculating Data	•
Appendix E: Glossary	•
Any other general comments or feedback	<ul style="list-style-type: none"> • The wording used in the draft standard is very focused on products. How does the standard relate to the provision of services. Reading through the draft one would conclude that they are not covered but I understand this is not the intention. Greater clarity and some worked examples need to be given on how a company would apply the standard to services they provide and whether the standard is limited to certain types of services or all services. It is therefore hard for a company like National Grid who provide a transportation and distribution service to fully comment on the draft standard without further understanding of how it would apply to us.

