World Business Council for Sustainable Development

WORLD RESOURCES INSTITUTE

The Greenhouse Gas Protocol

Scope 3 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:

- This Scope 3 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	•
Part 1	
1. Introduction	•
2. Accounting & Reporting Principles	•
3. Business Goals & Inventory Design	•
4. Mapping the Value Chain	• Fig 4.1 / Table 4.1 – T&D losses. Fig 1 shows them as Scope 2 with Table 4.1 category 3 capturing all other energy related activities as Scope 3. (also the footnote on p49 Fig 13.1 states 'include T&D losses' for scope 3 energy-related emissions). Is there an intention to distinguish between what constitutes a scope 2 or scope 3 T&D loss or will the principle that the choice

	of inventory boundary is dependant on the characteristics of the company still apply? We believe that, in substance, the standard for Scope 1&2 is seeking to focus reporting on those emissions that the company has ability to control. National Grid currently classifies losses on the electricity T&D networks as scope 3 on the basis that National Grid has limited ability to control the reduction of these losses. The key matters impacting the extent of T&D loss-related emissions are type of fuel burnt in generation and physical distance between source of generation and supply. National Grid's ability to influence or control are limited due to; • National Grid has no control or influence over the selection of fuels burnt at power plants to generate electricity • National Grid has either no or limited / weak influence over the location of power plant with respect to centres of demand and thus magnitude of resistance losses • In the US where National Grid is obliged to purchase and supply some of the electricity transmitted across its network the regulatory requirements restrict its ability to select sources of electricity that would help reduce losses •
5. Setting the Boundary	• Page 18 line 26 states that companies shall report emissions for each scope 3 category determined to be relevant. In Part 2 page 51 line 38 it also states that company's should include direct suppliers that collectively account for 80%.. In Part 1 the implication is that if a category is determined relevant (ie part of 80% total scope 3) a company should report on all emissions in that category. However this is different to the advice in Part 2 where it implies that for individual categories a company reports on 80% of that category. If this was applied to a number of categories the total % reported on for scope 3 would be less than 80%.
5.1 Prioritizing Relevant Emissions	•
5.2 Prioritizing Relevant Emissions Based on Size	•
5.3 Prioritizing Relevant Emissions Based on Other Criteria	•
6. Collecting Data	• Agree with the proposed hierarchy but focus should be on using best quality data available so not supportive of mandating primary data requirements in the short term.
6.1. Prioritizing Activities	•
6.2. Assessing Data Sources	•
6.3. Collecting data	•
7. Allocating Emissions	•
12. Assurance	•
13. Reporting and Communication	• Page 49 Fig 13.1 – the scope 3 cateogries in the table do not correspond with the list of categories in table 4.1. There are 3 'other' categories in Fig 13.1 but it is missing Purchased Goods and Services – direct supplier emissions and

	Waste Generated in Operations. With an extensive list of categories what do you expect to go in 'other'?
Part 2	
1. Purchased Goods and Services- Direct (Tier 1) Supplier Emissions	• Page 51, line 38 - See comments above on setting the boundary – the guidance on 80% in this section is confusing against the guidance in Part 1 section 5. • Page 51, line 18 – will you be providing guidance on material emission factors to use • It is not clear how you differentiate which purchased goods and services are captured under this category as opposed to category 2 (cradle to gate emissions) • Page 52, line 7 advises use of Product Life Cycle Standard for collection of emission data. Looking at the Product Life Cycle Standard this is measuring cradle to grave or cradle gate emissions – using this standard for this category seems to duplicate the approach for next category (2)
2. Purchased Goods and Services – Cradle-to-Gate Emissions	•
3. Energy-Related Activities Not Included in scope 2	•
4. Capital Equipment	•
5. Transportation & Distribution (upstream/inbound)	• Is the intention to capture distribution & transportation where a 3rd party company is used different from the supplier of the product? On the basis that category 2 is measuring cradle to gate I assume it is but the draft is not explicit and may cause confusion as to whether we need to split out the transportation and distribution element of the categories 1 and 2.
6. Business Travel	•
7. Waste Generated in Operations	•
8. Franchises Not Included in Scope 1 and 2 (Upstream)	•
9. Leased Assets Not Included in Scope 1 and 2 (Upstream)	•
10. Investments Not Included in Scope 1 and 2	•
11. Franchises (Downstream)	•
12. Leased Assets (Downstream)	•
13. Transportation & Distribution (Downstream/ Outbound)	•
14. Use of Sold Products	•
15. Disposal of Sold Products at the End of	•

Life	
16. Employee Commuting	• Page 88, line 37 – why are we using 52 weeks? – this doesn't take into account holidays. If we reduce the 52 by the average number of week annual leave a company gives a more accurate calculation.
Glossary	•
Any other general comments or feedback	•