

A broad coalition backs **higher-integrity** electricity accounting

The Greenhouse Gas Protocol has published the responses to its proposed Scope 2 reforms. They reveal a credible, diverse coalition — grid experts, regulators, academics, NGOs and leading companies — backing rules that tie clean-power claims to **where and when** energy is actually consumed.

THE CONSULTATION ISN'T A VOTE — IT'S AN INTEGRITY TEST

1

Credible experts agree — so do leading businesses

Google, Constellation, Engie, Fervo, Climate Group, Iron Mountain, NRDC, Sierra Club, and academics from Princeton, TU Berlin and others are among a large coalition of companies, NGOs, regulators, and academics who agree these updates are needed for integrity and real decarbonization.

2

This is possible today

Granular, hourly electricity accounting is already being done at scale across the world — proven by leading companies, energy suppliers and solution providers. A reasonable phase-in gives time to scale it even further, and flexibility measures in the proposed rules enable these updates *today*.

3

Sadly, but unsurprisingly, many companies want the path of least resistance

Companies want the easiest rules — no surprise. It is unfortunate that so many companies would rather disguise their true emissions than be honest and transparent. Pushing for the status quo (optional hourly and locational matching) is not tenable. Reform is necessary.

4

Over 50% of responses were anonymous

This is unusual for a public comment process and indicates potential abuse of the option to respond anonymously. Notably, no Big Tech company — besides Google, who was very supportive — responded transparently, despite the sector's well-documented influence campaign.

1072

Consultation
responses
published

4x

Civil society and
academics back hourly
matching 4x more than
corporates do

**Near-unanimous
support**

from the Independent
Standards Board, plus a large
majority of the expert
Technical Working Group

IN THEIR OWN WORDS

What the responses say

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The hourly matching proposals in this consultation would drive increased deployment of LDES. Buyers with voluntary or mandated emissions targets – large corporates and energy suppliers – would have greater incentive to procure clean power from LDES during periods when there is no output from solar or wind.

Long Duration Energy Storage Council

STORAGE ASSOCIATION AND ADVOCATE

“

With hourly matching, corporate electricity users claiming to have used clean energy will be required to procure power that actually matches their demand on the grid, meaning costs will not be shifted onto other ratepayers for the integrating variable renewables onto the grid.

NRDC
ENVIRONMENTAL NGO

“

Research evidence from my group suggests that using load profiles can deliver similar consequential system-level benefits (more renewables, storage, clean firm, and demand flexibility) as actual hourly meter data while providing greater flexibility and feasibility for organizations.

Jesse Jenkins
PROFESSOR, PRINCETON UNIVERSITY

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As the decarbonization landscape matures, however, the framework should now evolve toward an approach that more accurately reflects temporal realities.

Engie
ENERGY SUPPLIER

“

Hourly matching drives decarbonization by sending signals and investment direction to deploy technologies necessary to decarbonize all hours of the day.

Iron Mountain
LEADING COMPANY

“

Flexidao converted a portfolio of Google's energy certificates into hourly format for over 100 sites, representing 10.5 TWh of energy across 7 countries. Google has implemented hourly accounting and calculated our hourly market-based Scope 2 emissions across our global operations.

Google
LARGE ENERGY BUYER

ORGANISATIONS BACKING HIGHER-INTEGRITY ACCOUNTING (NON-EXHAUSTIVE)

Google Fervo Constellation Energy Nordea Asset Management Iron Mountain
Clean Air Task Force NRDC Sierra Club Union of Concerned Scientists TU Berlin
University of Oxford Regulatory Assistance Project Amazon Employees for Climate Justice
The Climate Group KPN ...and many more

WHAT'S NEXT

The Independent Standards Board will review consultation responses as part of the established GHGP process. This is **not a voting exercise** — the quality of consultation responses is critical when considering revisions.

FURTHER READING

[Hourly Matching Feasibility](#) [About Time: Real-World Hourly Accounting](#)
[GHGP Scope 2 Expert Opinions](#) [Academics Support Scope 2 Reform](#) [NGOs Support Scope 2 Reform](#)
[Investors Support Scope 2 Reform](#)