



GHGP Scope 2 Consultation

A first look under the hood

What 1,072 survey responses actually say about the future of electricity emissions accounting.

6 AUGUST 2026

Quick refresher

CONSULTATION TOPICS

Consequential offsets consulted separately

**Count clean power by the hour,
on local grids**

Flexibility built in

Load profiles · exemptions · legacy clause · phase-in

Request for input, *not a vote*

TIMELINE

- **Oct 2025 – Jan 2026**
104 days · 183 questions
- **July 2026** **WE ARE HERE**
All 1,072 responses published
- **Next**
Revision → Board vote → ~Published 2028

Four key takeaways

1 Pushback was expected

2 A credible coalition supports reform

3 Odd patterns under the hood

4 Not a voting exercise

TAKEAWAY 1 OF 4

Pushback was expected

Ignore simplistic headlines

THE SIMPLISTIC HEADLINE

**"70%
oppose
hourly"**

SURE, BUT...

Companies dominated responses

Industry famously opposes accountability

"May not shall" = flawed status quo

Response quality & non-anonymity = higher support

This is not a voting exercise

Industry pushback has been wrong in the past

Seen in the past:



TAKEAWAY 2 OF 4

A credible coalition supports reform

A credible coalition supports the updates

LEADING COMPANIES & INVESTORS

Google

Fervo

Iron Mountain

Constellation

Engie

KPN

esVolta

Quintrace

EDF Group

ElectricityMaps

Nordea Asset Management

...and more

ACADEMICS & NGOS

Union of Concerned Scientists

Princeton ZERO Lab

TU Berlin

ShareAction

Sierra Club

NRDC

Regulatory Assistance Project

Clean Air Task Force

Amazon Employees for Climate Justice

Climate Group

...and more

"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

"Buyers [...] would have a greater incentive to procure clean power from LDES"

Long Duration Energy Storage Council

STORAGE ASSOCIATION & ADVOCATE

"Research evidence from my group suggests that using load profiles can deliver similar consequential system-level benefits [...] while providing greater flexibility and feasibility for organizations."

Jesse Jenkins

PROFESSOR, PRINCETON UNIVERSITY

Opposition to proposed changes

ON HOURLY MATCHING

Data & system readiness

ON HOURLY MATCHING

Cost

ON DELIVERABILITY

Restrictive

ON DELIVERABILITY

Market disrupt

The GHGP process is well established to consider each of these concerns and integrate their feedback into an updated proposal

Hourly accounting is already happening at scale

10.5 TWh

of Google's certificates
converted to hourly across
100+ sites in 7 countries

46+

suppliers offer hourly-matched
tariffs, in markets covering 73%
of global electricity demand

70+

countries where certificate
registries are upgrading to
hourly — 4,000+ TWh of
tracked power

Live

hourly certificates already
issued or **traded** in ERCOT and
PJM, with price signals forming

**The feasibility objections are
answered inside the proposal itself.**

FLEXIBILITY BUILT IN:

- Load profiles down to a universal flat-average
- Exemption threshold for smaller buyers
- Legacy clause for existing contracts
- Multi-year phase-in

TAKEAWAY 3 OF 4

Odd patterns under the hood

Over half the responses were anonymous

53.5%

filed with their identity redacted — 573 of 1,072. Unusually high for a public comment process.

WHO FILED ANONYMOUSLY

Companies  **70%**

Financial institutions  **71%**

Academics  **23%**

Data & analytics  **20%**

Anonymous filings were more negative

Big Tech, minus one, sat out publicly

Anonymity was allowed — the pattern is the point

Labels didn't always match the organizations behind them

~1/3

of named respondents filing as **"NGO / civil society"** were flagged as trade associations, business coalitions, vendors. etc.

~1/4

of named **"academia / research"** claims were not academic institutions — and 31 of 44 answered as individuals, not institutions.

12

filings came from **the same** electronics manufacturer group.

Before quoting "even NGOs opposed" or "1,072 stakeholders" — check who is actually talking.

No stakeholder group speaks with one voice — not even companies. Each response has to be weighed on its own merits.

TAKEAWAY 4 OF 4

Not a voting exercise

This is not a voting exercise

THE EVALUATION CRITERIA

- 1 Scientific Integrity
- 2 Environmental Impact
- 3 Feasibility

THE PROCESS AND GOVERNANCE

TWG Expert Technical Working Group drafts the proposals — **a large majority backed the proposal**

ISB Independent Standards Board approved consulting on them — **near-unanimously**

PUBLIC CONSULTATION **Input, not votes** — one element of the ongoing process

NEXT TWG revises with the feedback, then the ISB votes on the final revision

Evidence quality varies

>2× more likely that hourly matching *supporters* cite a checkable source — a URL, DOI, or journal reference — vs opponents, and **far more likely to cite peer-reviewed evidence**.

Most-cited in support

TU Berlin, Princeton University, Google

24/7 carbon-free electricity matching accelerates adoption of advanced clean energy technologies

Peer-reviewed paper



DTU, University of Edinburgh, et al

Does the purchase of voluntary renewable energy certificates lead to emission reductions? A review of studies quantifying the impact

Peer-reviewed paper



Princeton University

System-level impacts of voluntary carbon-free electricity procurement strategies

Peer-reviewed paper



Most-cited in opposition

Corporate Energy Buyers Association

CEBA member survey and letter

Self-selected survey, advocacy letter



WattTime

Evaluating the Impacts, Costs, and Consequences of Proposed Scope 2 GHG Emissions Reporting Standards

Working paper, not peer-reviewed



McKinsey

Rethinking your company's clean-power strategy

Consultant report



What happens next

JUL 2026 (DONE)

GHGP publishes all 1,072 responses and its summary

NOW

TWG & Secretariat reconvene to revise the draft under the process principles

NEXT

Revised draft goes to the Independent Standards Board for a vote

~2028

Revised standard anticipated, with multi-year phased implementation



- Consultation input will be **looked at carefully, not obeyed mechanically** — that is the normal course of standard-setting.
- Coordination with **ISO** on aligned international standards continues in parallel.

TO CLOSE

The four takeaways, once more

1

Opposition from the regulated was expected — question the easy headlines

2

A credible coalition backs the updates — and proves them feasible today

3

Under the hood: majority-anonymous filings and labels that don't hold up

4

It's not a vote — evidence quality is what the process weighs



Questions?

Get in touch, or dig into the data yourself.

ellie@energytag.org

energytag.org

FURTHER READING

[Hourly Matching Feasibility Memo](#)

[Experts & Leaders Support Scope 2 Reform](#)

[17-Researcher Open Letter](#)

[Civil-Society Letter](#)

[Investor Letter](#)

[GHG Protocol Announcement & Raw Data](#)