

May 28, 2025

Dr. Alexander Bassen
Chair, Independent Standards Board
Greenhouse Gas Protocol
10 G Street NE, Suite 800
Washington, DC 20002

Re: BCSE Comments on Proposed Scope 2 Market-Based Accounting Revisions

Dear Independent Standards Board Chair Dr. Bassen,

On behalf of the Business Council for Sustainable Energy (BCSE), we commend the Greenhouse Gas Protocol for its continued role in providing globally trusted emissions accounting guidance and appreciate the work underway to revise the Corporate Standard, including Scope 2 guidance. We understand the Scope 2 Technical Group is working to develop a proposal that will be available for public comment later in the year, but we wanted to share perspectives that can be helpful as the proposal is being developed and refined.

BCSE is a coalition of companies and trade associations from across the clean energy spectrum, including renewable energy, energy efficiency, natural gas, energy storage, sustainable transportation, and emerging low-carbon technologies. Since 1992, BCSE has worked to expand the deployment of sustainable energy solutions through policy advocacy, business engagement, and market-based approaches. Our members include clean energy developers, utilities, large energy buyers, and technology providers, many of whom depend on consistent GHG reporting standards to validate and accelerate climate action.

As clean electricity demand continues to grow, Scope 2 market-based accounting has become one of the most effective tools for empowering organizations to manage their greenhouse gas emissions and to drive investment into low- and zero-carbon generation. The current framework enables credible climate leadership by allowing the use of contractual instruments, such as Energy Attribute Certificates (EACs), to account for purchased clean energy. These instruments are essential to financing new projects and are widely used across public and private sectors.

According to the [2025 Sustainable Energy in America Factbook](#), produced by BloombergNEF in partnership with BCSE, corporate clean energy purchasing reached new heights in 2024, with nearly 22 GW of long-term power purchase agreements (PPAs) announced in the United States alone. Virtual PPAs represented over 80% of this activity, reinforcing their role as a cornerstone of the voluntary clean energy market. These deals rely heavily on the continued eligibility of EACs in Scope 2 market-based accounting and have directly enabled the buildout of large-scale solar, wind, and storage capacity across the country.

The success of these mechanisms is not hypothetical – it is visible in the marketplace. Voluntary buyers have driven more than 100 GW of new clean energy in the United States over the past decade, demonstrating the importance of preserving this pathway. Narrowing the definition or use of market-based instruments could freeze investment, stall new projects, and undermine broader climate goals.



BCSE strongly urges the GHG Protocol to preserve and strengthen market-based accounting options in the Scope 2 framework. We offer the following key recommendations:

1. **Maintain the current dual-method approach** that allows entities to report both location-based and market-based emissions. Market-based accounting enables lower-carbon procurement, empowers energy buyers, and supports grid decarbonization.
2. **Preserve flexibility in accounting and procurement options** that can be reflected in the scopes, including non-hourly matched unbundled EACs, utility-delivered clean energy, and long-term PPAs from resources operating in the same national market. Additional tools, such as hourly matching or deliverability metrics, can be encouraged as voluntary enhancements but should not become minimum requirements.
3. **Protect existing investments** by clearly stating that existing contractual instruments, and instruments procured before the revised guidance has been finalized, will continue to be eligible under revised guidance. This ensures regulatory certainty and honors prior climate commitments.
4. **Expand, rather than narrow, participation** by recognizing a wide variety of procurement models that reflect the real-world diversity of energy users and regional electricity markets.
5. **Clarify guidance for emerging technologies**, including storage-backed clean electricity, location/time-matched procurement, and grid-interactive solutions, without disqualifying the approaches that are currently driving significant impact.

The evidence is clear that market-based Scope 2 reporting has driven large-scale private sector investment in clean energy. [RE100 companies](#), which now number more than 400 globally, continue to prioritize certificate-based clean energy purchasing to meet ambitious climate targets. As demand increases, a flexible, credible, and accessible Scope 2 framework will be critical to sustaining this momentum.

In closing, BCSE believes that now is the time to accelerate the tools that enable emissions reduction through voluntary clean energy procurement. The GHG Protocol can continue to lead by maintaining a balanced, inclusive approach that supports integrity, innovation, and investment.

Thank you for your consideration. We look forward to continued engagement and stand ready to assist in any way as the revision process moves forward.

Sincerely,

Lisa Jacobson
President
Business Council for Sustainable Energy