

BCSE Submission to the Science Based Targets initiative (SBTi) Power Sector Survey on the second consultation draft of the Power Sector Standard

September 7, 2026

The Business Council for Sustainable Energy (BCSE) appreciates the opportunity to provide comments through the Science Based Targets initiative (SBTi) Power Sector Survey on the second consultation draft of the Power Sector Standard. The comments below present BCSE's survey responses as a standalone statement, organized by subject area rather than by individual survey question.

Scope and Applicability of the Power Sector Standard

BCSE acknowledges and appreciates that the second draft explicitly adds "biogas from waste" to the activities within the scope of the Power Sector Standard. This is an important improvement from the first draft and helps clarify that waste-derived biogas pathways are intended to be covered. However, ambiguity remains regarding the scope and treatment of biogas and biomethane.

In particular, the Standard should clarify whether "biogas from waste" encompasses the full range of waste-derived biogas and biomethane pathways, including electricity generated through combustion as well as non-combustion technologies such as fuel cells, and whether upgraded biomethane used for power generation is included. The Standard should also clarify how these pathways relate to the broader references to biomass and other low-carbon generation sources.

Clear and comprehensive treatment is important because biogas and biomethane can be produced from a wide range of waste-based feedstocks, including wastewater, manure, food waste, landfill gas, and other organic materials. These pathways can provide dispatchable renewable power and, depending on the feedstock and methodology used, can have very low or net-negative lifecycle emissions due in part to avoided methane emissions.

BCSE therefore recommends that SBTi explicitly define "biogas from waste" and clarify that the scope encompasses both biogas and upgraded biomethane derived from eligible waste-based feedstocks, regardless of the electricity generation technology used. The scope and emissions treatment should comprehensively capture the full range of waste-derived biogas and biomethane applications to prevent inconsistent interpretation and avoid inadvertently excluding or mischaracterizing low- and negative-emission renewable power pathways.

Scope and applicability should also align with CNZS-C35 for bio-based feedstocks. BCSE continues to recommend removing the 5%/10,000 tCO₂e applicability thresholds. In alignment with BCSE's response to the first consultation, these thresholds are unnecessary in a voluntary standard and may unnecessarily exclude smaller or distributed power generation projects from using the Standard.



Stand-Alone Heat Generation

BCSE supports expanding the Power Standard to include stand-alone heat generation, consistent with the broader need for companies to have flexibility in deploying low-carbon energy solutions across end uses.

Should SBTi expand the scope, BCSE recommends that the Standard explicitly include waste-derived biogas and biomethane and apply consistent accounting principles across heat and power applications. This will help ensure that renewable gaseous fuels are treated consistently regardless of whether they are used to generate electricity, heat, or both.

Interaction with the Corporate Net-Zero Standard for Bio-Based Feedstocks

The interaction between the Power Sector Standard and CNZS-C35 remains unclear for bio-based feedstocks, particularly manure, food waste, sewage sludge, and industrial residues. Requirements such as "documented regrowth cycles" do not naturally apply to waste-derived feedstocks. SBTi should clarify how C35 applies to these pathways and ensure requirements are appropriately tailored to waste-derived biogas and biomethane.

Sector Metrics, Disclosure, and Biogenic Emissions

While the mapping of activities to sector metrics is clear, the Standard does not provide sufficient specificity on the accounting treatment of biogas and biomethane to ensure these metrics can be calculated consistently. Further clarification is needed on the applicable boundaries and treatment of different biogas applications.

BCSE supports greater visibility of CH₄ and N₂O emissions, but biogas treatment remains unclear. Section B.3 includes "biogas from waste," while Metric-PS.1 excludes biomass combustion and the low-carbon threshold references direct CO₂. SBTi should clarify the treatment of biogenic CO₂ from biogas and include complementary lifecycle disclosure capturing relevant upstream impacts and avoided methane emissions.

Asset Transition Targets and Non-Baseload Generation

BCSE supports allowing non-baseload assets to be excluded from the asset transition target. However, the eligibility criteria should be structured as alternative pathways rather than cumulative requirements. A capacity factor threshold can be a useful indicator of peaking operation, but it may not fully capture resources that provide critical reliability services. Assets retained primarily for reliability, resource adequacy, reserve capacity, ancillary services, reliability-must-run obligations, black-start capability, or operation during peak demand conditions should remain eligible where supported by objective and verifiable evidence. A flexible framework will better reflect the diversity of power system needs while preserving the credibility of the Standard.

Market-Based Instruments, Energy Attribute Certificates, and Hourly Matching

The explicit CNZS cross-reference and disclosure by retirement mechanism improve clarity regarding the use of market-based instruments. However, the references also introduce an



hourly matching requirement that could constrain procurement options. BCSE supports optional hourly disclosure and recommends that hourly matching remain voluntary rather than a validation or target-achievement requirement while market infrastructure, tracking systems, and customer demand continue to mature.

BCSE supports the use of energy attribute certificates (EACs) to mitigate Scope 3 electricity emissions. However, BCSE opposes requiring consequential accounting criteria for these transactions, especially in the near term.

Asset Transition Planning, Disclosure, and Grid Reliability

BCSE recommends that asset transition planning and disclosure requirements allow appropriate flexibility for commercially sensitive or proprietary information, including capital expenditure plans, retirement dates, and asset lifetime assumptions. Transition plans should also be able to account for factors outside a company's control, including regulatory approvals, resource adequacy requirements, ISO/RTO directives, reliability-must-run obligations, and evolving market conditions. These considerations are important to avoid conflicts between Standard alignment and obligations necessary to maintain adequate power supply and grid reliability.

Target-Setting Methods and Pathways

Annex B provides a clearer and more accessible summary of the methods and pathways than the first draft. However, practical implementation still depends on the separate method and pathway sheets. SBTi should ensure these supporting materials provide sufficient detail and are consistent with the requirements and definitions in the Standard.

Additional BCSE Submission Following the Power Sector Survey

BCSE supports the provisions relating to targets that will drive the use of EACs for Scope 3 emissions. BCSE also supports the fact that these provisions do not currently mandate hourly matching or other consequential accounting requirements that could limit the practical use of EACs. Maintaining this flexibility will help enable credible target-setting while allowing markets, registries, metering systems, and accounting practices to develop.