



Professor Dr. Alexander Bassen
Chair of the Independent Standards Board
Greenhouse Gas Protocol

Dear Independent Standards Board Chair Professor Dr. Bassen,

The Greenhouse Gas Protocol has driven massive decarbonization impact but is risking its future success. The current Scope 2 Guidance has enabled corporate clean energy buyers to secure over 100 gigawatts (GW) of clean energy in the United States¹ since 2014 and 263 GW globally². We share a goal for all grids to be 24/7 carbon emissions-free and the conviction that this transition is urgently needed. However, imposing stricter time and location accounting requirements at the organizational level is inefficient and infeasible for most buyers and may curtail ambitious global climate action.

The Clean Energy Buyers Association (CEBA) is deeply concerned with the current direction of the Scope 2 Guidance revision process. If the process stays this course, we fear that many corporate clean energy buyers may pull back on investments in clean energy. This would undermine the relevance and impact of the Protocol, reverse more than a decade of progress, and jeopardize future global climate action. To avoid these outcomes and ensure the voluntary market continues to be a driving force in global grid decarbonization, we urge immediate changes in the Protocol's revision process.

CEBA members support optional granular time and location matching but cannot abide by mandatory matching. CEBA is a business association that activates corporate energy buyers to advance low-cost, reliable, carbon emissions-free global electricity systems. CEBA's 400+ members represent over \$20 trillion in market capital and include energy buyers of every type.

- **A majority of our members would face serious implementation challenges with a mandatory time and location accounting approach.** These accounting changes would fundamentally change the practical context of voluntary procurement. Mandating hourly and location matching is not just inefficient, it is very difficult to implement for most energy buyers. Hourly matching has only been adopted by a small group of companies. It will simply not work for the vast majority of buyers.³
- **Buyers are already experiencing procurement challenges in many markets under current market boundaries.** Tightening market boundaries in the United States and European Union would exacerbate the challenges and could lead to less procurement in those markets.

¹ CEBA Deal Tracker, <https://ceb buyers.org/deal-tracker>

² S&P Global, [2022 briefing](#) (February 2023) and [this article](#) (February 2025)

³ Note also McKinsey & Company's [article](#) on grid-focused corporate action (February 2025) and the American Council on Renewable Energy's [white paper](#) on voluntary offtake (December 2024).



- **A recent survey of CEBA members⁴ demonstrates these concerns.** Of the energy buyers surveyed, 75% oppose mandatory hourly time matching accounting, while 19% support it. Similarly, 66% oppose stricter market boundaries, while 22% support them.

CEBA urges action now to shore up the process, protect the integrity and credibility of the Protocol, and avoid unintended consequences. We appreciate the immense resources the Protocol has already invested in this revision. To keep the revision process credible and ensure the revised Scope 2 Guidance will remain highly relevant, we urge the Independent Standards Board to:

- 1. Increase and enhance engagement with energy buyers.** We are concerned that the limited representation of energy buyers has led to a severe underappreciation of the feasibility of any proposed Scope 2 changes. We support the Protocol's focus on "integrity" and "impact," but we assert that "impact" is dependent on what is feasible.
- 2. Make necessary adjustments before the public consultation phase.** The credibility of the revised Scope 2 Guidance will be strengthened if the concerns raised in this letter are addressed before the public is invited to comment and if the Greenhouse Gas Protocol Secretariat includes a summary of all Technical Working Group proposals—both majority and minority views—in the official record.
- 3. Align the consequential metric development to the Scope 2 Guidance timeline.** Buyers must be able to assess all Scope 2 revisions simultaneously to understand the collective effects on the market and feasibility of implementation. The consequential metric development, currently led by the Actions and Market Instruments Technical Working Group, should be accelerated to come into alignment with the Scope 2 location- and market-based revisions.

CEBA and its members are invested in the success of this revision, to build on over a decade of progress on climate action. The Scope 2 Guidance should continue its pivotal role in catalyzing, not limiting, corporate climate action to accelerate grid decarbonization. We are eager to discuss how CEBA can be a resource and partner in this revision process.

Respectfully submitted,

Rich Powell
Chief Executive Officer, CEBA

⁴ Survey conducted in May 2025. Results reflect answers of 32 CEBA energy buyer member companies.