

EUDCA response – Greenhouse Gas Protocol Scope 2 Public Consultation Survey

This document contains exclusively the questions from the survey to which the EUDCA provided a response.

Section 3

Proposed revisions to definitions and purpose of the location-based method and market-based method

18. Please provide any feedback on the proposal to refine the definition of scope 2, to emphasize its role within an attributional value chain GHG inventory and clarify that scope 2 must only include emissions from electricity generation processes that are physically connected to the reporter's value chain, excluding any emissions from unrelated sources?

Please note that feedback on specific changes to the location- and market-based method can be provided in sections 4 and 5.

EUDCA's perspective is that the existing definition of scope 2 properly focuses on both consumption and procurement. We do not agree with the proposed change: "scope 2 must only include emissions from electricity generation processes that are physically connected to the reporter's value chain."

While closely connected, how companies use electricity and how they source it are two separate business activities. Back in 2014, the GHGP recognized this by incorporating both aspects into their Scope 2 definition and creating two distinct accounting approaches - the location-based method for actual consumption and the market-based method for procurement choices. This dual framework remains relevant today and will continue serving its purpose in the years ahead. The Scope 2 MBM should continue to account for procured market-based instruments/contracts within the inventory and incentivize grid decarbonization.

Companies' ability to use large-scale procurement tools with aggregated facility loads, across wide geographies, is absolutely foundational to clean energy markets and the revenue-certainty that clean energy developers require to achieve project financing. Constraining market-based solutions to those that are physically connected to site locations would dramatically limit organisations' ability to sign larger, long term, more impactful clean energy contracts that contribute to the delivery of new renewable energy.

From a widely recognised and adopted methodology, the proposed changes might actually push operators away from its implementation while potentially undermining data centers ability to comply with sustainability legislation and requirements in Europe.

The EUDCA is supportive of many methods to decarbonise as possible and appropriate in different European markets, including hourly matching as one possible way to the achievement of the target for clean energy set by the industry under the Climate Neutral Data Centre Pact*. However, this should remain optional, allowing data centre operators to resort to hourly matching in countries where the energy system allows.

*<https://www.climateneutraldatacentre.net/>

19. Please provide any feedback on the proposed clarification to the LBM definition to reflect scope 2 emissions from generation physically delivered at the times and locations of consumption, with imports included in LBM emission factor calculations where applicable? Please note that feedback on specific changes to the location-based method can be provided in section 4.

Agree with the proposed changes.

EUDCA agrees that location-based method (LBM) should use “defined geographic locations”. This should be the method under which the reporter focuses on geographic deliverability and time of use.

20. Please provide any feedback on the proposal to clarify the MBM definition to retain its existing basis, quantifying Scope 2 from contractually purchased electricity via contractual instruments, while specifying temporal correlation and deliverability when matching instruments to consumption? Please note that feedback on specific changes to the market-based method can be provided in section 5.

Disagree with the proposed changes.

EUDCA’s perspective is that the existing definition of the Market Based Method as a measure of a company's electricity procurement regardless of physical deliverability or time of use is appropriate. The updated Scope 2 guidelines should not change from the current definition of the market-based method.

Market-based Scope 2 should continue to account for market instruments (contracts) of emissions attributes within a “market boundary”. It should not mandate that such instruments are matched on an hourly basis nor demonstrate deliverability

The market-based method has played an important role in catalyzing corporate clean energy procurement enabling corporate clean energy purchasers to secure 263 GW* globally. This redefinition would undermine the effectiveness of the market-based method in mobilising corporate capital.

The definition of the market-based method should continue to focus on contractual procurement within a defined market boundary without imposing mandatory hourly matching or physical deliverability requirements. While temporal correlation and deliverability are important for emerging 24/7 carbon-free energy initiatives, the way to account for these should remain optional rather than mandatory. Any clarification should allow for flexibility for diverse procurement models while ensuring transparency and credibility without indirectly creating barriers to market access.

* Source S&P Global, 2022 briefing (February 2023) available at this link <https://commodityinsights.spglobal.com/rs/325-KYL-599/images/Clean-Energy-Procurement-Market-Briefing-Feb2023.pdf> and this article (February 2025) accessible at this link <https://www.spglobal.com/commodity-insights/en/news-research/blog/energy-transition/022825-data-centers-drive-surge-in-clean-energy-procurement-in-2024>

67. For which reporting year would your organization be ready to apply the revised Scope 2 Standard based on these proposed changes in its GHG inventory? (For example, if the Standard is published in 2027, the reporting year 2027 inventory is typically prepared and reported in 2028)

Select only one:

- Earlier than reporting year 2027 (already aligned)
- Reporting year 2027 (inventory prepared in 2028)
- Reporting year 2028 (inventory prepared in 2029)
- Reporting year 2029 (inventory prepared in 2030)
- Reporting year 2030 (inventory prepared in 2031) or later
- Later than Reporting year 2030
- Not applicable

68. Please provide additional context regarding how this timeline could be shortened and note any region or sector-specific context.

Implementation before 2030 is not feasible. Budgeting for CAPEX, such as metering and system upgrades, requires multi-year planning and multiple layers of organisational approval. Combined with existing EU reporting obligations (EED annual reports, heat reuse project reporting, cost-benefit analyses, and upcoming data centre labels), the additional complexity and resource demand would overload teams. A phased timeline extending beyond 2030 is essential to maintain compliance and operational stability without non-viable business cases and massive administrative burdens and investments to steer this steep learning curve through each company without digital regional solutions.

Phased implementation is essential to manage the steep learning curve and infrastructure gaps across the industry. Additionally, burden reduction requires systemic solutions: standardised regional policies, automated data exchange from DSOs, and assurance approaches that rely on electronic tracking and sample audits instead of exhaustive manual validation.

69. If you have operations or experience in the US, please select your preferred deliverable market boundary for the US (Please see the table *Proposed methodologies for demonstrating deliverability* for references to these options):

Section 5

Market-Based Method

To answer some of the questions throughout section 5 about changes to the market-based method, respondents need to know what is specifically meant by an 'exemption to hourly matching'.

As the criteria for an exemption is being developed through this consultation process, please use the default exemption conditions when responding to questions that reference an exemption.

Default exemption conditions: Companies with annual consumption up to [X] GWh/year in a deliverable market boundary may use a monthly or annual accounting interval for Criteria 4 for all operations within that market boundary. To apply this default please identify the:

Deliverable market boundary for your region of operation

- *For all regions outside of the US please use the deliverable market boundary defined in the table *Proposed methodologies for demonstrating deliverability**
- *For the US, where a deliverable market boundary has not yet been defined in the table *Proposed methodologies for demonstrating deliverability*, please select your preferred market boundary from the list in question 69*

71. On a scale of 1-5 do you support an update to Quality Criteria 4 to require that all contractual instruments used in the market-based method be issued and redeemed for the same hour as the energy consumption to which the instrument is applied, except in certain cases of exemption.

- 1 - No Support
- 2 - Little Support

- 3 - Neutral
- 4 - General Support
- 5 - Full Support

74. Please provide concerns or reasons for why you are not supporting, if any.

Select all that apply:

- More information is necessary to understand how investments not matched on an hourly basis will be accounted for and reported via the framework under development by the Actions & Market Instrument TWG
- Hourly matching should follow an optional 'may' rather than a required 'shall' approach
- Hourly matching should follow a recommended 'should' rather than a require 'shall' approach
- Concern about negative impact on comparability, relevance and/or usefulness of MBM inventories
- Concern that a phased implementation would be insufficient for development of the infrastructure necessary (e.g., registries, trading exchanges, etc.) to support hourly contractual instruments
- Concern that administrative, data management, and audit challenges posed by this approach would place an undue burden and costs on reporters
- Concern that requiring hourly matching does not create meaningful improvements to inventory accuracy
- Concern that a requirement for hourly contractual instruments could discourage global participation in voluntary clean energy procurement markets
- Other (please explain)

75. Please provide comments regarding your concerns or reasons for why you are not supportive.

The EUDCA believes hourly matching should remain optional, with no exemption needed. We reject mandatory hourly matching and oppose making it a requirement under the market-based method. The idea that hourly matching is the best or only way to reduce system-level emissions is contested by many in the business and academic community (Expert Consensus Open Letter). Hourly matching is one of several procurement approaches, each with pros and cons, and we do not support making it mandatory under the market-based method.

Mandatory hourly matching is difficult, often impossible for most energy buyers. Making it compulsory risks slowing voluntary corporate procurement. The Scope 2 standard should encourage broad participation and flexibility, allowing companies to pursue preferred strategies, including optional hourly matching or other impact-driven approaches.

As PPA investors, we do not find the proposed MBM revisions decision-useful relative to their added cost and complexity. For multi-site European operators, these changes do not improve capital allocation decisions. Instead, they increase data integration and assurance burdens, reduce continuity with historical trends, and risk misalignment with regulatory practices.

- Concerns with universal applicability: A mandatory hourly requirement is not globally implementable due to differences in electricity markets, grid design, renewable maturity, and data availability. A universal rule would be impractical, inequitable, and risk excluding large parts of the global economy from voluntary procurement. Where hourly data is unavailable, using load profiles is neither feasible nor desirable, reducing comparability and auditability while adding administrative burden. Such methods, if permitted, must remain optional, regulator-approved, within the same spatial boundary, and secondary to interval data.

- Concern about inventory accuracy: Mandatory hourly matching would not significantly improve Scope 2 accuracy. Given electricity system characteristics, hourly matched instruments are not inherently more deliverable or emissions-representative than annual ones. Increased data gaps and proxy use could reduce precision. In some grids, multiple buyers pursuing hourly matching can create inefficiencies and raise costs; one study estimates residential customers could pay 26% more.

- Need for clarity on non-hourly investments: Further guidance is needed on how non-hourly matched investments will be treated within the Actions & Market Instrument framework, including comparability, assurance, and long-term decision usefulness.

- Hourly matching should remain optional: Hourly matching may suit markets with mature data and sufficient clean energy supply, but requiring it would limit participation. More granular alignment can be valuable for some buyers, but it should remain voluntary.

- Administrative and audit burden: Hourly matching aligns consumption and procurement visually but lacks a direct emissions link. Hourly matched carbon free energy (CFE) is often no more deliverable than annual CFE. Requiring hourly matching would impose disproportionate administrative burdens, especially where missing data must be approximated. It introduces significant data management and audit complexity, requiring high-resolution metering, granular certificate tracking, and expanded assurance. These systems are not widely available across Europe, making compliance more complex than current annual certificate-based reporting. Implementing hourly matching would require new data rights, IT integration, and staff training, representing a major shift for data centres.

- Risk of discouraging global participation: Requiring hourly contractual instruments could deter voluntary clean energy procurement, especially for globally companies operating across markets with uneven renewable availability and data maturity. Reduced participation would undermine, not accelerate, system-level decarbonisation.

78. Please indicate your best estimate of the internal administrative effort (people/process/controls) of the proposed hourly matching requirement relative to your current MBM process using annual matching. Assume 3 is your current level of effort

- 1 - Much less
- 2 - Slightly Less
- 3 - Same
- 4 - More
- 5 - Much more

79. Please indicate your best estimate of the external service cost (cash outlays to vendors, data, assurance) of the proposed hourly matching requirement relative to your current MBM process using annual matching. Assume 3 is your current external cost.

- 1 - Much less
- 2 - Slightly Less
- 3 - Same
- 4 - More
- 5 - Much more

80. What are the feasibility measures you would anticipate relying on:

Select all that apply:

- Load profiles for activity data (facility-specific)
- Load profiles for activity data (utility/customer-class or regulator-approved)
- Load profiles for activity data (time-of-use averages)
- Load profiles for activity data (flat average across hours)
- Load profiles for contractual instruments (same production asset)

- Load profiles for contractual instruments (facility-specific)
- Load profiles for contractual instruments (regional publicly available)
- Phased implementation
- Legacy clause

81. What are the assumed main drivers affecting internal workload and external service costs after applying feasibility measures:

Select all that apply:

- Registry/market access for hourly EACs
- Vendor/platform upgrades or new tools
- Data integration (profiles, APIs), system configuration
- Assurance/internal controls and evidence trails
- Staff capacity/training
- Contracting/sourcing changes for hourly instruments
- Metering/interval data access arrangements
- Other (specify)

82. Please provide any additional comments regarding your response to questions 77 - 81

Q80: We would rely on a Legacy clause as the primary feasibility measure. The level of investment required for metering, digital tracking tools, and assurance processes makes implementation before 2030 unrealistic. None of the listed load profile options meaningfully reduce burden for multi-country operators with large portfolios. A legacy clause is essential to protect existing long-term contracts and allow phased adoption without destabilising procurement strategies.

Q81: All of the drivers selected above. Other: "transaction/regulatory costs." Mandatory hourly matching fundamentally changes procurement: many buyers would need to fragment impactful vPPAs into numerous smaller deals or shift to spot RECs, raising legal, transaction, and assurance costs. For smaller entities and globally distributed loads, hourly matching is often infeasible due to market/regulatory limits. It also requires complex optimisation tools, expanded data management, and hourly-resolution validation when hourly consumption data are not broadly available from utilities. Costs escalate materially (metering/IT integration, staffing/training, evidence trails), and the push to cover every hour can force

over-procurement/over-build to chase diminishing returns. Even with exemptions or a legacy clause, the combined administrative burden and cost are high, especially for multi-country operators.

In Europe, hourly emission factors at the operational grid boundary are not generally accessible for corporate reporting. While some pilot datasets exist in select markets (e.g., Nordics), they are not standardised, publicly available, or comprehensive across interconnected grids. Current practice relies on annual or monthly factors published by system operators or regulators.

In some cases, hourly matching is not only hard/expensive, it is also completely impossible. These include small/midsize companies with distributed load across the globe who would no longer be able to work with a developer for offtake, or many geographic regions whose regulatory markets cannot support hourly matching. Requiring hourly matching, even with exemptions and legacy clauses, leaves many of these nonstarters in a difficult situation.

83. On a scale of 1-5 do you support an update to scope 2 Quality Criteria 5, to require that all contractual instruments used in the market-based method be sourced from the same deliverable market boundary in which the reporting entity's electricity-consuming operations are located and to which the instrument is applied, or otherwise meet criteria deemed to demonstrate deliverability to the reporting entity's electricity-consuming operations?

Select only one:

- 1 - No Support**
- 2 - Little Support**
- 3 - Neutral**
- 4 - General Support**
- 5 - Full Support**

86. Please provide reasons of concern or why you are not supporting, if any.

Select all that apply:

- Proposed deliverability requirements do not improve alignment with GHG Protocol Principles**
- Concern that narrower market boundaries restrict companies' abilities to invest in areas where renewable energy development could yield the greatest decarbonization impact**
- Concern that narrower market boundaries could prompt a shift away from long-term agreements (i.e., PPAs) to spot purchases (unbundled certificates)**

- **Sourcing contractual instruments within deliverable market boundaries should follow an optional “may” rather than a required “shall” approach**
- **Sourcing contractual instruments within deliverable market boundaries should follow a recommended “should” rather than a required “shall” approach**
- **Concern that the defined market boundaries do not align with mandatory or voluntary reporting requirements in your region**
- **Support deliverability in principle, but the proposed market boundary for my region does not reflect deliverability**
- **Market boundaries should be defined as the geographic boundaries of electricity sectors, which align with national, and under certain circumstances, multinational boundaries**
- **Exemptions to matching within deliverable market boundaries should be allowed for markets lacking sourcing options**
- **Other (please explain)**

87. Please provide comments regarding your selected reasons for why you are not supporting.

We do not support requiring all contractual instruments to originate from the same deliverable market boundary. The update would require all instruments used for Scope 2 market-based reporting (PPAs, RECs, GOs) to be sourced from the same deliverable market boundary as the reporting entity’s load and to demonstrate deliverability.

While this appears to increase precision, it conflicts with electricity market structures, procurement mechanisms, and operational realities, especially for large energy-intensive operators such as data centres. Operators rely on vPPAs and GOs across interconnected grids

to enable large-scale renewable investment. Narrow deliverability rules would invalidate widely accepted instruments without offering a viable alternative, create stranded financial risk, and force premature renegotiation of long-term contracts without improving emissions accuracy.

In Europe, hourly emission factors at the operational grid boundary are generally not accessible for corporate reporting. Pilot datasets exist in limited markets but are not standardised, public, or comprehensive across interconnected grids. For multi-site operators, the share of load with accessible hourly factors is effectively zero. Current practice relies on annual or monthly factors published by system operators or regulators.

- Requiring all instruments to originate from the same deliverable boundary would disqualify widely used contract types. Large electricity consumers rely on a portfolio approach reflecting liberalised markets. vPPAs are financial instruments, not physically deliverable to a specific grid zone, while RECs and GOs are intentionally fungible to enable scalable decarbonization across interconnected and non-interconnected markets. These instruments are widely recognised, bankable, and embedded in long-term strategies.
- Long-term energy contracts often represent significant investments (tens to hundreds of millions). New eligibility constraints would: render existing contracts non-qualifying, force renegotiation or abandonment of valid agreements, create stranded financial exposure without added emissions reductions. This introduces significant financial and contractual risk.
- It would also introduce major administrative and audit burdens and misalign with CSRD, CDP, and ISSB, reducing comparability and slowing decarbonisation. The proposal requires continuous validation of deliverability criteria not standardised or verifiable across grids. This would: add substantial administrative and audit burden, increase compliance costs without improving data quality, disproportionately impact operators in fragmented or immature markets.

ISSB, CSRD, and CDP recognise contractual instruments without requiring strict co-location. The proposed change would: create misalignment across reporting regimes, increase audit complexity, reduce comparability for sustainability disclosures users.

- In many regions, renewable development is constrained by permitting delays, labour shortages, and supply chain issues. Local supply is insufficient to support strict deliverable boundary matching, especially for operators pursuing hourly matching. This risks penalising organisations for structural limitations beyond their control and slowing decarbonisation.

Q86: All selected concerns apply. The proposed deliverability requirement does not improve alignment with GHGP principles and would restrict investment in regions where renewable development has the greatest impact. It risks shifting procurement from impactful long-term PPAs to short-term unbundled certificates, undermining additionality and market stability.

The proposed update to Scope 2 Quality Criteria 5 would introduce significant financial, operational, and compliance disruption while undermining established procurement mechanisms. It risks invalidating legitimate contracts, slowing renewable investment, and fragmenting reporting alignment without delivering meaningful environmental benefit.

90. For deliverable market boundaries (outside of the United States) identified in the table Proposed methodologies for demonstrating deliverability: Deliverable Market Boundaries, please provide comments on whether these market boundaries:

- ***Appropriately reflect the deliverability of electricity in that region***
- ***Align with mandatory or voluntary reporting requirements in that region, please provide an example of the programmatic requirements and the impacts of these proposed changes on alignment***
- ***Are likely to cause any region-specific feasibility challenges (provide specific examples)***
- ***If you prefer a different deliverable market boundary than identified in the table Proposed methodologies for demonstrating deliverability: Deliverable Market Boundaries, please describe this boundary***

Please clearly identify the region you are referring to in your comments:

Europe. The EUDCA does not support the proposal to rely on ENTSO-E bidding zones in Europe. These bidding zones are changeable and could change over the lifespan of a long term PPA contract.

Businesses need greater certainty around market boundaries than the proposed methodologies would provide to be able to make long-term investment decisions.

For Europe, we recommend an alternative proposal for market boundaries based on synchronous grids, including Ireland and the UK.

92. Please estimate the anticipated internal administrative effort (people/process/controls) of the proposed deliverability requirement relative to your current MBM process using broad market boundaries. Assume 3 is your current level of effort.

Select only one:

- 1 - Much less**
- 2 - Slightly less**
- 3 - Same**
- 4 - More**
- 5 - Much more**

93. Please estimate the anticipated external service cost (cash outlays to vendors, data, assurance) of the proposed deliverability requirement relative to your current MBM process using broad market boundaries. Assume 3 is your current external cost.

Select only one:

- 1 - Much less
- 2 - Slightly less
- 3 - Same
- 4 - More
- 5 - Much more

94. What are the feasibility measures you would anticipate relying on to report using deliverable market boundaries:

Select all that apply:

- Phased implementation
- Legacy clause

95. What are the assumed main drivers affecting internal workload and external service costs after applying feasibility measures:

Select all that apply:

- Data access/rights for EACs/registries aligned to deliverable market boundaries
- Vendor/platform upgrades or new tools
- Data integration (profiles, APIs), system configuration
- Assurance/internal controls and evidence trails
- Staff capacity/training
- Contracting/sourcing changes for contractual instruments within deliverable market boundaries
- Metering/activity data reporting configured to match deliverable market boundaries
- Other (specify)

96. Please provide any additional comments regarding your response to questions 92-95.

Q92: The proposed deliverability requirement would drastically increase internal administrative effort compared to current MBM practice. It would require new processes for validating market boundaries, reconfiguring procurement strategies, and maintaining evidence trails for deliverability—none of which exist today. For multi-country operators, this means complex data integration, expanded assurance controls, and contract restructuring across numerous grids. Combined with legacy contract management and regulatory alignment, the workload would be significantly higher than current annual matching practices.

Q94: We would rely on phased implementation to sequence process, metering, IT, and assurance changes across countries and facilities, and a legacy clause to protect existing long-term instruments (PPAs, GoOs/RECs, supplier contracts) that were executed under current rules. Together, these are the only practical measures to avoid stranded contracts, manage multi-year CAPEX approval cycles, and maintain operational continuity while transitioning to deliverable market boundaries.

Q95: Other - coordination of all the change management actions would further impact staffing needs and would be contrasted against perceived real benefit.

All selected drivers represent significant workload and cost impacts. Beyond technical upgrades and metering, the need for integrated systems, expanded assurance controls, and retraining staff adds complexity. Contracting changes and multi-jurisdiction alignment compound the challenge. Coordination of these actions across large portfolios would require substantial resources, making the overall effort disproportionate to the incremental benefit.

113. On a scale of 1-5 do you support the updated definition of residual mix emission factors to reflect the GHG intensity of electricity, within the relevant market boundary and time interval, that is not claimed through contractual instruments, including voluntary purchases or Standard Supply Service allocations?

Select only one:

- 1 - No Support**
- 2 - Little Support**
- 3 - Neutral**
- 4 - General Support**
- 5 - Full Support**

116. Please provide reasons of concern or why you are not supporting, if any.

Select all that apply:

- Requiring a residual mix emission factor to be calculated per market boundary will further reduce availability of residual mix emission factors
- Allowing reporters to use different temporal precision of residual mix emission factors within a deliverable market boundary will negatively impact comparability
- Market boundaries used for calculating a residual mix emission factor should be defined as the geographic boundaries of electricity sectors, which align with national, and under certain circumstances, multinational boundaries
- Markets should self-determine if Standard Supply Service is included in a residual mix emission factor
- Increases administrative complexity of calculating a residual mix emission factor
- Other (please explain)

117. Please provide comments regarding your selected reasons for why you are not supporting.

Q113: We support the concept of a residual mix, but do not support redefining it at highly granular spatial/temporal levels. In Europe’s interconnected grids, electricity and attributes flow across borders; sub-national “postal code” or zonal splits risk fragmentation, double counting, and poor comparability. Residual mix should remain at established market boundaries (e.g., national level or, where appropriate, synchronous systems) and annual cadence, with imports/exports handled via established residual mix methodologies (e.g., AIB-style treatment). Until credible, standardised hourly residual mixes exist across Europe, finer granularity would add cost and audit burden without improving decision-usefulness.

Q116: Other - In Europe’s highly interconnected grids, sub-national or hourly residual mixes risk fragmentation and inconsistent audit trails. Multi-country data centre portfolios would face significant systems changes, added assurance work, and uneven data availability—reducing comparability versus current national/supranational residual mix practice (e.g., AIB approaches). Until standardised, regulator-endorsed methods and datasets are broadly available, finer granularity adds cost and complexity without improving decision-usefulness.

141. Please provide any additional comments on the anticipated change in costs for hourly-matched, deliverable EACs, PPAs, etc. relative to current practices. If applicable, please include comments if and how this would impact your procurement strategy for carbon free electricity?

The revised guidance would cut up loads into smaller market boundaries, reducing scale and increasing coordination costs needed for the most impactful purchases like PPAs. In some circumstances where hourly matching is not possible, or when distributed load can no longer be aggregated, this would halt procurement.

Hourly matching would push procurement from long-term PPAs to unbundled spot RECs, which are 60% less effective at getting clean energy built.

Below you can find some examples of the impact, taken from the US and EU:

- Hourly matching would direct investment toward existing clean energy. For example, a recent \$3B purchase of 3 GW of existing hydropower could otherwise have financed 800 MW of new solar power, saving 1.5M tCO₂.year

- Restricting market boundaries would prevent more impactful purchases in dirtier grids. For example, the City of Cambridge operates in the 2nd cleanest grid in the US but signed a PPA in the second dirtiest grid in the US, saving 2-3 times more carbon than building the same project locally. This would not be possible under the revised guidance

- This is also applicable in the EU. For instance, in 2023 Poland (662 gCO₂/kWh), Czechia (450 gCO₂/kWh) and Germany (371 gCO₂/kWh) had the highest carbon intensity for electricity generation due to the high share of coal in their mix. In the same year Sweden's carbon intensity for electricity generation was 41 gCO₂/kWh. Thus a renewable energy project deployed in Poland delivers greater CO₂ abatement per MWh of added renewables, but would not be possible under the proposed deliverability guidance

Source: Ember Electricity Review 2023 <https://ember-energy.org/latest-insights/european-electricity-review-2024/eu-electricity-trends/>

Section 6: Exemptions - Hourly Matching Exemption Threshold

Option 1. Companies with annual consumption up to [X] GWh/year in a deliverable market boundary may use a monthly or annual accounting interval for Criteria 4 for all operations within that market boundary in accordance with the contractual instruments temporal data hierarchy.

Option 2. Companies that meet the small and medium company categorization may use a monthly or annual accounting interval for Criteria 4 for all operations within that market boundary in accordance with the contractual instruments temporal data hierarchy.

Option 3. Companies with annual consumption up to [X] GWh/year in a deliverable market boundary or meet the small and medium company categorization may use a monthly or annual accounting interval for Criteria 4 for all operations within that market boundary in accordance with the contractual instruments temporal data hierarchy.

Option 4. Companies with annual consumption up to [X] GWh/year in a deliverable boundary and meet the small and medium company categorization may use a monthly or annual accounting interval for Criteria 4 for all operations within that market boundary in accordance with the contractual instruments temporal data hierarchy.

153. On a scale of 1-5 do you support allowing for exemptions to hourly matching using one of the options (1-4) described above?

Select only one:

- 1 - No Support
- 2 - Little Support
- 3 - Neutral
- 4 - General Support
- 5 - Fully Support

153. On a scale of 1-5 do you support allowing for exemptions to hourly matching using one of the options (1-4) described above?

Select only one:

- 1 - No Support
- 2 - Little Support
- 3 - Neutral
- 4 - General Support
- 5 - Fully Support

154. Please provide your reasons for support, if any.

Select all that apply:

- Reflects a reasonable balance of integrity, impact and feasibility as organizations under a threshold collectively contribute to fewer Scope 2 emissions than the largest consumers
- Encourages organizations under a threshold to continue to engage in voluntary procurement using an annual procurement approach
- Provides a more equitable approach for reporting as hourly matching could be more challenging for organizations under a threshold
- Reduces transition strain on the electricity market and hourly matching infrastructure
- Other (please provide)

155. Please provide any additional comments regarding your reasons for support.

We do not support mandatory hourly matching. However, in the event that mandatory hourly matching moves forward, exemptions are necessary in order to preserve momentum in clean energy development. This is primarily due to the fact that hourly matching is not feasible for many load structures, regions, and administrative processes.

That being said, we propose making hourly matching optional, rather than mandatory, with exemptions. Making hourly matching optional with a consequential option in parallel allows for two feasible options in which comparability can be preserved. Making hourly matching mandatory with exemptions, thresholds, a legacy clause, etc. adds complexity and weakens the ability for organisations to compare their MBM results to one another.

Section 7: Legacy clause considerations

171. On a scale of 1-5 do you support introduction of a Legacy Clause to exempt existing long-term contracts that comply with the current Scope 2 Quality Criteria from being required to meet updated Quality Criterion 4 (hourly matching) and Quality Criterion 5 (deliverability)?

Select only one:

- 1 - No Support**
- 2 - Little Support**
- 3 - Neutral**
- 4 - General Support**
- 5 - Fully Support**

172. Please provide your reasons for support, if any.

Select all that apply:

- Reflects a reasonable balance of integrity, impact and feasibility as existing long-term contracts reflect significant financial and operational commitments to energy resources**
- Encourages organizations with legacy contracts to continue to engage in voluntary procurement using an annual procurement approach**
- Provides a more equitable approach by ensuring that early adopters of Scope 2 Guidance are not disadvantaged**
- Helps maintain trust and market confidence in long-term contracts**

- Provides a pragmatic pathway for organizations to transition to updated Quality Criteria
- Other (please provide)

173. Please provide any additional comments regarding your reasons for support.

We do not support mandatory hourly matching. If hourly matching becomes mandatory:

- Legacy clause is absolutely necessary, together with exemptions for facilities operating in countries where the energy infrastructure cannot provide the necessary information for hourly matching.

- Not including a legacy clause could erode confidence in carbon accounting and destabilize energy investment. PPAs and other offtake agreements (e.g., REC strips) that enable financing for clean energy projects require long-term commitments. Developers need long contracts in order to match the tenor of their debt. Failure of a standard such as the GHGP to provide consistency will undermine planning and investments into more efficient facilities.

- Policy uncertainty (e.g., major changes to carbon accounting standards like GHGP) makes long-term commitments hard or impossible. Companies will be stuck with contracts signed under different rules that no longer meet the goals they were signed to achieve. There should be a clear date from which new facilities will have to comply with the changed methodology, with no retroactive effect for facilities already in operations.

174. Please provide your concerns or reasons for why you are not supporting, if any.

Select all that apply:

- Reduces overall accuracy and relevance of MBM reporting
- Introduces inconsistencies across companies, reducing transparency and comparability for users
- Not aligned with MBM's purpose, weakens credible market signals and abatement planning, and may conflict with regulatory expectations
- Creates reputational risk and increases skepticism about MBM claims
- Fragments the voluntary market and may slow the transition to wider availability/use of hourly data
- Other



About EUDCA

The European Data Centre Association (EUDCA) represents the interests of the European data centre community. Established in 2011, the EUDCA is the voice of the industry, with a diverse membership which includes European and international data centre operators, equipment suppliers, and a network of national trade associations.

Our policies and initiatives are consistently centred around data centre operators, both in defining the data centre of the future and in regulating markets.

The EUDCA has been at the forefront of the energy transition efforts of the data centre industry. As co-founder of the Climate Neutral Data Centre Pact, the EUDCA is deeply committed to taking the industry on the road to climate neutrality by 2030. As the voice of the industry, we call on European policymakers to help us realise this vision.

www.eudca.org