2026-8-24

SBTi Power Sector Net-Zero Standard

Survey Questions and Responses

Standard introduction, scope and applicability

Questions:

20. Do you have any additional comments or suggestions on the activities and emissions in and out of scope and the applicability criteria? (open response, maximum 500 characters)

EMA supports provisions that drive the use of EACs for Scope 3 emissions, and that the Standard does not mandate consequential accounting requirements that could limit the practical use of EACs. This flexibility will enable credible target-setting while allowing markets, registries, metering, and accounting practices to develop. Furthermore, SBTi should retain a broad definition around common electricity markets. At most, grid boundaries should be defined as synchronized electricity markets.

Target-setting Criteria, PS-C5: Retail of purchased electricity

Questions:

41. To what extent do you agree that the criterion PS-C5 provides sufficient clarity on the applicability of market-based instruments for implementing targets on the share of low-carbon electricity purchased and sold?

Strongly agree, agree, neutral, disagree, strongly disagree

42. To what extent do you agree that disclosing LCE attribute retirement with hourly granularity is feasible for electricity retailers setting targets through PS-C5?

Note: PS-C5 does not establish an independent framework for market-based instruments. It expressly incorporates the Corporate Standard's implementation requirements, particularly Sections 4.3 and 4.4. Therefore, if EMA considers those Corporate Standard provisions sufficiently clear, PS-C5 is also sufficiently clear about which instruments may be used and the conditions governing them.

Strongly agree, agree, neutral, disagree, strongly disagree

46. Please describe any customer-specific expectations around the LCE attributes listed in Q43 (e.g., our customers ask that we retire LCE attributes sourced from the same country

or region as their consumption, from LCE projects less than 15 years of age, from LCE generated in the same hour as consumption, etc.) and if you see any particular barrier in tracking them (e.g. energy certificate systems such as GOs, RECs, I-RECs, that currently do not track these attributes). (open response, max. 500 characters)

EMA supports the use of EACs to mitigate scope 3 electricity emissions, however, we oppose requiring consequential accounting criteria to these transactions, especially in the near term. Existing REC markets demonstrate that clear and consistent accounting treatment can mobilize substantial capital. Changes that dilute companies' ability to meaningfully account for EAC procurement could disrupt functioning markets and create unnecessary uncertainty for project development.

Target-setting methods and pathways, Scope 3 retail of purchased electricity

Questions:

60. To what extent do you agree that the proposed Linear Alignment method is an appropriate method of setting science-based targets for retailers of electricity purchased?

Strongly agree, agree, neutral, disagree, strongly disagree

Note: The Linear Alignment method establishes a straight-line trajectory from a company's base-year share of low-carbon electricity to 100% by the applicable net-zero year. Interim targets are calculated along that company-specific trajectory rather than by requiring the company to meet each regional pathway benchmark.

This would in theory create certainty and drive more deployment, so we should support.

Target-setting methods and pathways, Pathways and benchmarks

Questions:

62. To what extent do you agree that the low-carbon electricity pathway provides a feasible trajectory for companies to set targets on their share of low-carbon electricity purchased and sold to end users?

Strongly agree, agree, neutral, disagree, strongly disagree

Note: SBTi is proposing to set a target of 100% renewables by 2040, based on IEA's Net Zero scenarios. Again, this would in theory create certainty and drive more deployment, so we should support.