



Greenhouse Gas Protocol Scope 2 Consequential Methods Survey

Over the past year, HASI has actively engaged on the Greenhouse Gas Protocol (GHGP) Scope 2 and Consequential Methods Guidance Consultations to help shape a revised carbon accounting framework that supports practical, market-driven decarbonization.

Given the far-reaching implications of GHGP standards for clean energy investment, transparency, and impact measurement, HASI joined others on January 30, 2026, in submitting comprehensive responses to both the Scope 2 Public Consultation Survey and related Electricity-Sector Consequential Methods Public Consultation.

We are hopeful that GHGP's forthcoming Scope 2 standards (anticipated for publication by the end of 2027) will maintain both scientific rigor and reflect real-world market needs. The following summary reflects our responses.

Advocating Neutrality and Dual Accounting in Scope 2

Our responses to questions in the GHGP Scope 2 Public Consultation and Electricity-Sector Consequential Methods Public Consultation strongly advocate for maintaining the neutrality of the Scope 2 framework while stressing two critical needs for dual accounting: (1) an accurate, attributional inventory for GHG emissions, and (2) a complementary consequential metric that captures the real-world climate impact of corporate electricity procurement decisions. HASI supports retaining location-based and market-based methods as robust, allocational tools, but opposes any mandatory requirements for hourly or location-matched reporting (e.g., 24/7 time-matched RECs) in core inventory rules, due to feasibility, administrative burden, lack of proven accuracy benefits, and potential to undermine meaningful decarbonization action (such as long-term PPAs). Instead, we believe that all granular matching and deliverability requirements should be optional, not prescriptive ("may," not "shall"), and exemptions should be sufficiently broad to ensure market accessibility.

Consequential Reporting Must Capture Net Impact and Enable Investment

For consequential reporting, HASI believes the GHG protocol must include both avoided and induced emissions (not just avoided emissions) to support decision-useful, net climate impact reporting. Additionality tests for renewable energy projects should be flexible, favoring practical, investment-enabling standards (with "contractual/tenor" as a core required test, most others optional) rather than enforcing multi-test or highly stringent Technical Working Group proposals.

Prioritizing Feasibility, Comparability, and Practical Clean Energy Deployment

In our survey responses, HASI also emphasized that comparability and feasibility should be prioritized over unproven complexity and that the current proposals for service boundaries, hourly data, and legacy issues must accommodate real-world markets and legacy contracts. Across both survey responses, we urged the GHGP to maintain that the ultimate stance be one that upholds scientific rigor through transparent, measured reporting while ensuring that the new requirements enable, rather than restrict, the rapid and scalable deployment of new clean energy. We continue to advocate for the GHG Protocol to recognize the quantification of true climate impact for investors, consumers, and global markets.